

**Michigan's  
Resource Conservation  
and  
Recovery Act  
(RCRA)**

**Work Plan  
for  
Fiscal Year 2007**

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Michigan's RCRA Work Plan for Fiscal Year 2007  
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# Michigan's RCRA Work Plan for Fiscal Year 2007

## Introduction

### 1.0 Introduction

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#### **1.0 INTRODUCTION**

This Work Plan describes work the Michigan Department of Environmental Quality (MDEQ), Waste and Hazardous Materials Division (WHMD), is committing to accomplish during Fiscal Year 2007, October 1, 2006, to September 30, 2007 (FY07). This work fulfills the WHMD's obligations in its role of administering the national Solid Waste Disposal Act in Michigan, as amended by the Resource Conservation and Recovery Act of 1976 (RCRA), as amended by the Hazardous and Solid Waste Amendments of 1984.

The Director of the MDEQ functions as the designated representative of the Administrator of the U.S. Environmental Protection Agency (U.S. EPA).

## **1.1 ORGANIZATION OF THE WORK PLAN**

This Work Plan is organized in three sections, as follows:

### Introduction

This section consists of an overview of the Work Plan, detailing how it is organized and what guidance was used to develop its contents.

### Programs and Strategic Planning

This section consists of a narrative of the MDEQ's priorities for the year, including strategic planning activities. This narrative includes a description of how the overall program priorities coincide or vary from the U.S. EPA guidance and description of state-specific initiatives and priorities.

In addition, there is a more detailed account of priority activities specific to each program element, how activities relate to the U.S. EPA guidance, and further background on state priorities. Sections are separated, as in the *2003-2008 EPA Strategic Plan: Direction for the Future, September 30, 2003*, and Regional guidance (compliance and enforcement, permitting and closure, corrective action, authorization, waste minimization, management and reporting, and special initiatives). Also included is an estimate of work years for the elements and references to lists of planned activities and other documents. The program elements are as follows:

- 1) Compliance and Enforcement
- 2) Permitting and Closure
- 3) Corrective Action
- 4) State Authorization
- 5) Waste Minimization
- 6) Management and Reporting
- 7) Special Initiatives

### Scheduled Activities

This section consists of schedules of activities planned for the year (inspections, permits, etc.). Schedules show midyear milestones and end-of-year commitments.

Each page of the Work Plan includes a header that specifies the section title and number.

## **1.2 GUIDANCE DOCUMENTS USED TO DEVELOP WORK PLAN**

The U.S. EPA guidance documents used to develop this Work Plan are:

- 1) *2003-2008 EPA Strategic Plan: Direction for the Future, September 30, 2003*  
<http://www.epa.gov/ocfopage/plan/plan.htm>
- 2) *Office of Solid Waste and Emergency Response (OSWER) FY07 National Program Guidance*  
[http://www.epa.gov/finance/npmguidance/oswer/2007/2007\\_oswer\\_npmguide.pdf](http://www.epa.gov/finance/npmguidance/oswer/2007/2007_oswer_npmguide.pdf)

# Michigan's RCRA Work Plan for Fiscal Year 2007

## Introduction

### 1.3 FY07 RCRA Grant Work Year Distribution

#### 1.3 FY07 RCRA GRANT WORK YEAR DISTRIBUTION

The following table shows the distribution of work years among the various elements and objectives of the FY07 RCRA Grant Work Plan. If there is any discrepancy in this Work Plan between this table and the Work Plan text, this table takes precedence.

<b>RCRA Work Plan Program Element</b>	<b>Work Years</b>
Statutory/Regulatory/Application Development <ul style="list-style-type: none"> <li>• Obtain/Maintain Authorization</li> </ul>	1
Compliance Monitoring and Enforcement <ul style="list-style-type: none"> <li>• Inspections and/or Record Review</li> <li>• Timely and Appropriate Enforcement Action</li> <li>• Corrective Action Compliance and Enforcement</li> <li>• Manifest Processing</li> <li>• Hazardous Waste Technical Support Unit (TSU)</li> <li>• Waste Classification</li> <li>• Laboratory Support</li> </ul>	32
Permitting and Closure <ul style="list-style-type: none"> <li>• Permits</li> <li>• Postclosure Plans</li> <li>• Closures</li> <li>• Public Participation</li> <li>• TSU</li> </ul>	7
Corrective Action <ul style="list-style-type: none"> <li>• Planning and Priority Setting</li> <li>• Oversight</li> <li>• TSU</li> <li>• Waste Classification</li> <li>• Permitting/Closure/Corrective Action Tracking</li> <li>• Laboratory Support</li> <li>• Enforcement</li> </ul>	12
Management and Reporting <ul style="list-style-type: none"> <li>• Administrative Activities</li> <li>• Information Management and Reporting</li> <li>• Training</li> <li>• Information Requests</li> <li>• Laboratory Coordination</li> </ul>	11
<b>RCRA Total FTE Work Years</b>	<b>63</b>

## 2.1 INTRODUCTION

### Program Elements

In FY07 the MDEQ will use seven elements in an effective state program to manage hazardous waste through a delegation of RCRA authorities. These seven elements are:

- Permitting and Closure
- Compliance and Enforcement
- Corrective Action
- State Authorization
- Waste Minimization
- Management and Reporting
- Special Initiatives

The MDEQ's program priorities for FY07, including any strategic planning activities, are discussed below. The discussion is organized into the seven program elements listed above.

In Section 2, Programs and Strategic Planning, of the Work Plan, the following program and strategic planning information is presented for each of the seven program elements:

- the *OSWER FY07 National Program Guidance* goal for the program element
- the *OSWER FY07 National Program Guidance* priorities for the program element
- the MDEQ program strategy discussion

In Section 3, Scheduled Activities, of the Work Plan, the following additional detail is presented for each of the seven program elements:

- the MDEQ objective discussion for the program element
- the MDEQ considerations discussion for the program element
- the MDEQ scheduled activities discussion, by office and section

In order to make this Work Plan useful to the staff carrying out the work, the scheduled activities are grouped by the WHMD's offices and sections, where appropriate. This allows staff to easily see their office's program priorities for FY07.



## **2.2 COMPLIANCE AND ENFORCEMENT**

### Goal

Ensure that hazardous wastes are managed in a manner that protects human health and the environment by attaining and maintaining a high level of compliance within the regulated community. This includes ensuring the safe management of hazardous and nonhazardous waste and the cleanup of hazardous and nonhazardous releases.

### Priority

Compliance assistance activities should focus on newly-regulated handlers, handlers subject to new regulations, small businesses in the priority industrial sector (e.g., metal services entities), and other small businesses with compliance problems. Also, encourage the regulated community to voluntarily discover, disclose, and correct violations before being identified by regulatory agencies. A specific performance goal was not provided.

The U.S. EPA's Office of Enforcement and Compliance Assurance (OECA) "core program" includes the following inspection frequencies:

- federal facilities; annually
- treatment, storage, and disposal (TSD) facilities; every other year
- land disposal facilities; once every three years
- twenty percent of the large quantity generators (LQGs); annually
- an appropriate level of small quantity generators (SQGs); annually

### Compliance Program Strategy Discussion

Field compliance activities during FY07 will focus on the following activities in the Great Lakes watersheds instead of concentrating on priority industrial sectors:

- 1) Inspect and conduct the necessary follow-up activities at all categories of generators. The MDEQ inspection schedule for active TSD facilities usually meets or exceeds the OECA core program. In FY07 the MDEQ will reduce the number of SQG inspections and slightly increase the number of LQG inspections. This change will result in the inspection of approximately 20 percent of LQGs. Considering the MDEQ's historic concern for SQGs, the MDEQ proposes to preserve the flexibility in future years to focus on SQGs in lieu of 20 percent of LQGs.
- 2) Program improvements include continued attention to inspection quality and identification and tracking of response to violations. That, coupled with a broader inspection emphasis, allows staff to provide compliance assistance, including pollution prevention and waste information, directly to the regulated community.
- 3) Continue review of facility status in comparison to manifested waste data and follow up as appropriate.
- 4) Develop and implement a plan to address handlers who have not paid user charges.

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Programs and Strategic Planning  
2.2 Compliance and Enforcement

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- 5) Continue implementation of program to collect manifest data from nonreporting sites.
- 6) Continue review of identified manifest discrepancies.
- 7) Continue efforts during FY07 to identify and address transporters of hazardous waste without a registration and permit and/or financial responsibility (i.e., fleet liability coverage for accidental occurrences arising from hazardous materials transportation activities). These efforts are expected to identify noncompliances with other transporter requirements.

Office of Criminal Investigations (OCI) Discussion

The MDEQ's OCI activities in conjunction with the RCRA Work Plan are grouped into three areas of criminal investigation and enforcement:

- TSD facilities
- Hazardous waste transporters
- Generators

The OCI and the WHMD will continue to analyze available facility data relating to imported solid wastes, liquid industrial wastes, and hazardous wastes. Compliance reviews will include an evaluation of shipper waste characterization documentation and solid waste disposal facility screening procedures. Each individual facility's compliance with Part 111, Hazardous Waste Management, and Part 115, Solid Waste Management, of Michigan's Natural Resources and Environmental Protection Act, 1994 PA 451, as amended, will be evaluated.

The OCI, in conjunction with the WHMD, will continue periodic border crossing inspections targeting international waste haulers' importation and disposal activities. The OCI will strive to coordinate these efforts with the Ontario Ministry of the Environment for surveillance of hazardous waste movement across our common border. These efforts are designed to provide intelligence for future enforcement initiatives in concert with the Eastern and Western Michigan Environmental Crime Task Forces.

The OCI and the WHMD will continue to regularly communicate and work with the U.S. Customs to monitor waste shipments, identify violations and targets for enforcement actions, and prosecute violators.

The OCI and the WHMD will continue to examine existing waste data and knowledge bases for the purposes of providing for detection and targeting of potential noncompliant shippers for inspection. Uniform waste manifest databases, waste generation reports, TSD facility reports, manufacturing facility databases, and other objective factors will be analyzed to target users who have not paid significant user fees, delinquent financial assurance facilities, nonreporting sites, noncompliant shippers, unlicensed waste haulers, and manifests with discrepancies posing environmental harm (considering risk-based criteria), impacting on program integrity, and acting as a deterrent to future violations or violations by others.

## 2.3 PERMITTING AND CLOSURE

### Goals

The federal Government Performance and Results Act (GPRA) goals for safe waste management at hazardous waste facilities as specified in *OSWER FY07 National Program Guidance* are:

*The strategic target for permitting or other approved controls is 95% for 2008. In 2007, Regions are expected to meet the annual goal of 2.4% of the universe. Since all but two states are authorized to issue permits, and because states receive grant funds to implement the RCRA hazardous waste program, Regions must work with states to:*

- *Develop and implement multi-year strategies to meet the annual goals.*
- *Identify what is needed for each facility to achieve approved controls and determine when each facility is projected to achieve approved controls.*

*To meet the FY 2008 strategic target of updating controls to prevent releases at the approximately 150 facilities due for permit renewal by the end of 2006, Regions should work with states to develop and implement multi-year strategies to implement updated controls.*

The GPRA goal is written as “permitting or other approved controls” to encompass permit issuance and nonpermit activities (e.g., closure and postclosure plans approved, federal or state enforcement orders requiring closure and postclosure controls, corrective action orders, and Superfund referrals).

All regulated units at a GPRA baseline facility must have “approved controls” for the facility to get credit towards meeting the GPRA goal of safe waste management.

### Priority: Approved Controls in Place Baseline

The GPRA “approved controls in place” baseline consists of selected TSD facilities that the U.S. EPA has prioritized to have approved controls in place for the management of hazardous wastes. This baseline is a subset of the “universe” of all TSD facilities subject to be controlled by an administrative mechanism. The “universe” consists of two types of TSDs:

- TSD facilities with at least one hazardous waste management unit that was operating under a license or needed to obtain an operating license as of October 1, 1997; known as the “GPRA Controls in Place via Operating License Universe.”
- TSD facilities with at least one land disposal unit that ceased operating before October 1, 1997, and did not clean close; known as the “GPRA Controls in Place via Postclosure Operating License Universe.”

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Programs and Strategic Planning  
2.3 Permitting and Closure

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This universe is designed to be static, based on a snapshot of those TSD facilities that had at least one unit that needed either operating or postclosure controls as of October 1, 1997.

Table 2.3.1 Controls in Place by Facility: FY06-FY08 Baseline

The U.S. EPA's GPRA "approved controls in place" baseline of facilities for which the MDEQ is the lead regulatory agency is listed alphabetically in Table 2.3.1.

This table shows the actual and projected accomplishment dates for each facility, alphabetically. Hazardous waste management facility operating licenses issued after January 1, 1987, have corrective action requirements and are considered met for GPRA "controls in place" purposes. Dates shown as "1/1/2010," mean the projected date is not known but is unlikely to be the GPRA goal date of FY08.

An explanation of the abbreviated column headings is shown at the bottom of each page of the table.

TABLE 2.3.1 Controls in Place by Facility: FY06-FY08 Baseline, follows this page.

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2.3 Permitting and Closure

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**TABLE 2.3.1 CONTROLS IN PLACE BY FACILITY : FY06-FY08 BASELINE**

For the GPRA Controls In Place Baseline, shows the actual and projected accomplishment dates for each facility, alphabetically, and the resulting cumulative percentage of the baseline met. Operating Licenses issued after 1/1/87 have corrective action requirements and are considered met for GPRA "controls in place" purposes. Date Done = 1/1/10 means the projected date is not known but unlikely to be the GPRA Goal Date of 2008. See footnote for examples of approved controls in place. National Goals: 95% of facilities have approved controls in place by 2008 and renew permits/orders to maintain 95% Controls in Place by 2008.

			OP LIC ISSUE / PROJ	PCP ISSUE / PROJ	CAO ISSUE / PROJ	CC ACCEPTED / PROJ
1	ACCESS BUSINESS GROUP	MID 006 026 793	4/14/2000	4/14/2010		
2	ARKEMA INC	MID 005 363 114			9/21/1989	
3	ASHLAND CHEMICAL CO	MID 047 173 653			3/18/1988	8/1/1995
4	BASF CORP	MID 064 197 742			2/28/1994	3/30/2001
5	BASF CORP	MID 048 223 986			12/18/1998	12/25/1988
6	BAYER CROPSCIENCE LP	MID 080 358 351			11/20/2003	
7	CHEMICAL ANALYTICS INC	MID 985 568 021	9/30/2002	9/30/2012		
8	CWC CASTINGS DIVISION P	MID 006 030 357				9/26/1989
9	CYTEC INDUSTRIES INC	MID 005 360 680	3/31/1998	9/30/2008		8/17/2001
10	DAIMLER CHRYSLER CORP,	MID 990 760 100		9/30/2003	9/30/2003	
11	DEARBORN REFINING CO	MID 005 510 805			9/29/2000	9/2/1993
12	DELPHI ENERGY & CHASSIS	MID 017 079 625		9/30/2005		2/1/1991
13	DELPHI FLINT EAST - DORT	MID 005 356 647		1/21/2005 9/30/2002		
14	DETREX CORPORATION SIT	MID 091 605 972	1/31/2001	1/31/2011		3/24/1997
15	DETROIT DIESEL CORPORA	MID 005 356 803				2/2/1993
16	DOW CHEMICAL, MAIN PLA	MID 000 724 724	9/30/1988	9/30/2001	2/11/1997	
17	DOW CORNING MIDLAND PL	MID 000 809 632	9/29/2000	4/5/1996		12/16/1992
18	DRUG AND LABORATORY DI	MID 092 947 928	8/10/1999	9/30/2009		
19	DSC TRENTON PLANT-SITE	MID 017 422 304			12/17/1999	9/1/1998
20	DYNECOL INC	MID 074 259 565	3/16/1998	9/30/2008		
21	EDWARD C LEVY CO PLANT	MID 000 809 665			4/6/1988	9/29/1989
22	EDWARD C LEVY CO PLT 6	MID 094 549 425				9/29/1989
23	ENTHONE OMI INC	MID 056 717 747	9/29/1989			11/14/2001
24	EQ DETROIT INC	MID 980 991 566	12/12/2003			
25	EQ RESOURCE RECOVERY	MID 060 975 844	6/17/1993	9/30/2002		
26	FORD MOTOR CO ALLEN PK	MID 980 568 711	5/8/1989	9/30/2006	9/30/2004 9/30/2004	
27	FORMER DETROIT COKE C	MID 099 114 704			10/25/1999	
28	FORMER WYCOFF STEEL IN	MID 004 508 628		8/21/1996	5/1/2000	
29	GAGE PRODUCTS CO	MID 005 338 801	8/4/2003	2/5/2013		
30	GM FLINT VAN SLYKE COMP	MID 005 356 951				3/31/1992

OP LIC ISSUE / PROJ : operating license issuance or projected issuance date

PCP ISSUE / PROJ: post closure plan issuance or projected issuance date

CAO ISSUE / PROJ : corrective action order issuance or projected issuance date

CC ACCEPTED / PROJ: clean closure accepted or projected acceptance date

DATE:date of administrative control in place

CUM % : cumulative percentage of baseline facilities with controls in place accomplished

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**TABLE 2.3.1 CONTROLS IN PLACE BY FACILITY : FY06-FY08 BASELINE**

For the GPRA Controls In Place Baseline, shows the actual and projected accomplishment dates for each facility, alphabetically, and the resulting cumulative percentage of the baseline met. Operating Licenses issued after 1/1/87 have corrective action requirements and are considered met for GPRA "controls in place" purposes. Date Done = 1/1/10 means the projected date is not known but unlikely to be the GPRA Goal Date of 2008. See footnote for examples of approved controls in place. National Goals: 95% of facilities have approved controls in place by 2008 and renew permits/orders to maintain 95% Controls in Place by 2008.

				OP LIC ISSUE / PROJ	PCP ISSUE / PROJ	CAO ISSUE / PROJ	CC ACCEPTED / PROJ
31	GM PLANT SAGINAW MALLE	MID 005 356 696					11/8/1991
32	GMC METAL FABRICATING	MID 005 356 886					
33	GMC SAGINAW METAL CAS	MID 041 793 340	4/7/1982			6/2/1995	2/27/2004
34	GMC TECHNICAL CENTER-	MID 050 615 996	12/5/2001	6/30/2012			
35	GMPT FLINT NORTH SITE-M	MID 005 356 712					9/30/2008
36	GRAND BLANC LANDFILL	MID 980 506 265			9/30/2007		
37	GRANGER GRAND RIVER L	MID 082 771 700	9/30/1999	9/30/2009			
38	GREDE VASSAR INC VASSA	MID 005 513 262			9/30/2004	11/9/2004	11/9/2004
39	HADLEY INDUSTRIES DIV O	MID 982 222 242					4/30/1999
40	HENKEL SURFACE TECHNO	MID 058 723 867					
41	HOLCIM US INC DUNDEE PL	MID 005 038 500					2/10/1998
42	JOHNSON CONTROLS INC	MID 099 124 299				9/2/1988	6/5/1995
43	KHI INC	MID 006 020 895				9/30/2010	
44	KURDZIEL IRON OF ROTHB	MID 006 025 217			9/30/2006		
45	LACKS INDUSTRIES INC	MID 006 014 666				1/26/1990	
46	LACKS INDUSTRIES INC SA	MID 080 359 433			9/30/2004	9/5/1995	
47	LAFARGE MIDWEST INC	MID 005 379 607				12/15/1994	9/30/2005
48	LAKE STATES WOOD PRES	MID 990 687 964			9/5/1995		6/4/2001
49	LAMINA INC	MID 006 017 966			12/27/1994	9/30/1994	7/21/1998
50	MACDERMID INC	MID 005 338 371	10/3/1990				8/3/1999
51	MI DEPT/ENVIRON QTY STO	MID 980 825 632			8/9/2000	9/30/2000	8/5/1988
52	MICHIGAN DISPOSAL WAST	MID 000 724 831	9/30/1999	9/30/2006			9/2/1999
53	MICHIGAN SEAMLESS TUBE	MID 082 767 591			9/24/1998	4/7/2004	2/5/1990
54	MICHIGAN STATE UNIVERSI	MID 053 343 976	9/29/2000				
55	NATIONAL STANDARD NILE	MID 005 069 257				11/17/1995	4/24/1997
56	NATIONAL STANDARD NILE	MIT 270 010 549					3/4/1998
57	OCCIDENTAL CHEMICAL CO	MID 006 014 906		10/30/1979		3/1/1993	1/5/1993
58	PEPIN IRECO INC	MID 041 413 154					10/17/2000
59	PERFECT CIRCLE DIVISION	MID 980 499 735			5/30/2002	9/30/2001	
60	PERMA FIX OF MICHIGAN IN	MID 096 963 194	6/8/1982	9/30/2006		9/3/1991	7/30/2005

OP LIC ISSUE / PROJ : operating license issuance or projected issuance date

DATE:date of administrative control in place

PCP ISSUE / PROJ: post closure plan issuance or projected issuance date

CUM % : cumulative percentage of baseline facilities with controls in place accomplished

CAO ISSUE / PROJ : corrective action order issuance or projected issuance date

CC ACCEPTED / PROJ: clean closure accepted or projected acceptance date

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2.3 Permitting and Closure

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**TABLE 2.3.1 CONTROLS IN PLACE BY FACILITY : FY06-FY08 BASELINE**

For the GPRA Controls In Place Baseline, shows the actual and projected accomplishment dates for each facility, alphabetically, and the resulting cumulative percentage of the baseline met. Operating Licenses issued after 1/1/87 have corrective action requirements and are considered met for GPRA "controls in place" purposes. Date Done = 1/1/10 means the projected date is not known but unlikely to be the GPRA Goal Date of 2008. See footnote for examples of approved controls in place. National Goals: 95% of facilities have approved controls in place by 2008 and renew permits/orders to maintain 95% Controls in Place by 2008.

			OP LIC ISSUE / PROJ	PCP ISSUE / PROJ	CAO ISSUE / PROJ	CC ACCEPTED / PROJ
61	PETRO CHEM PROCESSING	MID 980 615 298	6/16/1999	6/16/2009		
62	PFIZER GLOBAL MANUFACT	MID 006 013 643	10/3/1990	9/30/2001		
63	PHARMACIA & UPJOHN CO	MID 000 820 381	3/30/2001	3/31/2001		9/30/1994
64	PONTIAC ASSEMBLY CENT	MID 005 356 902			9/25/1998	6/27/1991
65	PPG	MID 048 788 749				2/11/1993
66	REALM COLDWATER ROAD-	MID 005 356 860		3/15/1995	10/29/1992	
67	REICHHOLD INC FERNDAL	MID 020 087 128			6/22/1994	2/4/1992
68	RUGGED LINER INC	MID 058 816 927		9/30/2005	9/30/2006	11/13/2003
69	SAFETY KLEEN SYSTEMS	MID 000 722 686			6/16/1994	11/3/1999
70	SELFRIDGE AIR NATIONAL	MID 099 113 128				2/5/2001
71	SEVERSTAL NORTH AMERI	MID 087 738 431			5/1/2000	3/16/1988
72	SOLUTIA INC-PHOSPHATES/	MID 009 708 678		3/27/2002		
73	ST MARYS CEMENT	MID 094 553 419				10/21/1997
74	SYSTECH ENVIRONMENTAL	MID 981 200 835				9/21/2001
75	THE DOW CHEMICAL COMP	MID 980 617 435	1/12/1987	9/30/2005		
76	TPI PETROLEUM INC	MID 005 358 130	5/18/1982		9/30/2003	1/30/2003
77	TRITON	MID 088 754 668	9/28/2000		3/1/1991	8/15/2003
78	UNIVERSITY OF MI BECK R	MIR 000 001 834	7/16/1999	9/30/2009		
79	VISTEON CORPORATION SA	MID 009 305 665	9/28/1982		9/30/2006	
80	VISTEON MONROE	MID 005 057 005	3/27/1995	9/30/2005	3/27/1995	
81	WAYNE DISPOSAL INC	MID 048 090 633	4/14/1997	9/30/2002		
82	WOODLAND MEADOWS LDF	MID 000 810 408		9/30/2007		

OP LIC ISSUE / PROJ : operating license issuance or projected issuance date

PCP ISSUE / PROJ: post closure plan issuance or projected issuance date

CAO ISSUE / PROJ : corrective action order issuance or projected issuance date

CC ACCEPTED / PROJ: clean closure accepted or projected acceptance date

DATE: date of administrative control in place

CUM % : cumulative percentage of baseline facilities with controls in place accomplished

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Strategy

The U.S. EPA strategy for achieving the GPRA-approved controls in place baseline priority is to divide the baseline facilities into three groups: (1) those facilities that will meet the approved controls in place goal via the issuance of an operating license or a clean closure certification, (2) those facilities that will meet the approved controls in place goal via the issuance of a postclosure operating license or approval of a postclosure plan, and (3) those facilities that will meet the approved controls in place goal via the issuance of an enforceable order. These approved controls in place administrative mechanisms, or their equivalent, must be accomplished at a pace that will allow the national goals to be met for the entire FY06-FY08 Baseline "controls in place" by FY08.

Table 2.3.2 Controls in Place by Calendar Year: FY06-FY08 Baseline

The U.S. EPA's GPRA "approved controls in place" baseline of facilities for which the MDEQ is the lead regulatory agency is grouped by calendar year in Table 2.3.2. This table presents the same list of facilities as does Table 2.3.1, but it lists the facilities by the year in which the "controls in place" goal was achieved or is projected to be achieved.

This table shows the actual and projected accomplishment dates for each facility, by calendar year, and the resulting cumulative percentage of the baseline met. Hazardous waste management facility operating licenses issued after January 1, 1987, have corrective action requirements and are considered met for GPRA "controls in place" purposes. If the "Date Done" column contains "1/1/2010," it means the projected date is not known but is unlikely to be the GPRA goal date of FY08.

An explanation of the abbreviated column headings is shown at the bottom of each page of the table. However, two columns are explained further below.

**Date Done:** This date is selected based from the dates that are listed to the left for each facility, unless the "controls in place" is not expected to be met by FY08. This is the date that "controls in place" was achieved in the past or is projected to be achieved in the future, based on one of the following administrative controls in place mechanisms:

- operating license issuance
- postclosure plan approval
- corrective action order entry
- clean closure certification acceptance

**Cum %:** This column shows the percentile of each facility's rank in the schedule and, thus, our chronological progress in meeting the national GPRA schedule.



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The national goal is to have achieved 95 percent of the facilities with "controls in place" by FY08 (September 30, 2008). The table shows that the MDEQ expects to achieve "controls in place" for 95 percent of the baseline facilities by FY08 and, thus, meet the national goal of 95 percent.

TABLE 2.3.2 Controls in Place by Calendar Year: FY06-FY08 Baseline, follows this page.

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**TABLE 2.3.2 CONTROLS IN PLACE BY CALENDAR YEAR : FY06-FY08 BASELINE**

For the GPRA Controls In Place Baseline, shows the actual and projected accomplishment dates in each calendar year, and the resulting cumulative percentage of the baseline met. Operating Licenses issued after 1/1/87 have corrective action requirements and are considered met for GPRA "controls in place" purposes. Date Done = 1/1/10 means the projected date is not known but unlikely to be the GPRA Goal Date of 2008. See footnote for examples of approved controls in place. National Goals: 95% of facilities have approved controls in place by 2008 and renew permits/orders to maintain 95% Controls in Place by 2008.

		OP LIC ISSUE / PROJ	PCP ISSUE / PROJ	CAO ISSUE / PROJ	CC ACCEPTED / PROJ	DATE DONE	CUM %
<b>'1979</b>							
1	OCCIDENTAL CHEMICAL CO MID 006 014 906	10/30/1979		3/1/1993	1/5/1993	10/30/1979	1%
<b>'1987</b>							
2	THE DOW CHEMICAL COMP MID 980 617 435	1/12/1987	9/30/2005			1/12/1987	2%
<b>'1988</b>							
3	ASHLAND CHEMICAL CO MID 047 173 653			3/18/1988	8/1/1995	3/18/1988	4%
4	DOW CHEMICAL, MAIN PLA MID 000 724 724	9/30/1988	9/30/2001	2/11/1997		9/30/1988	5%
5	EDWARD C LEVY CO PLANT MID 000 809 665			4/6/1988	9/29/1989	4/6/1988	6%
6	JOHNSON CONTROLS INC MID 099 124 299			9/2/1988	6/5/1995	9/2/1988	7%
<b>'1989</b>							
7	ARKEMA INC MID 005 363 114			9/21/1989		9/21/1989	9%
8	CWC CASTINGS DIVISION P MID 006 030 357				9/26/1989	9/26/1989	10%
9	EDWARD C LEVY CO PLT 6 MID 094 549 425				9/29/1989	9/29/1989	11%
10	ENTHONE OMI INC MID 056 717 747	9/29/1989			11/14/2001	9/29/1989	12%
11	FORD MOTOR CO ALLEN PK MID 980 568 711	5/8/1989	9/30/2006	9/30/2004	9/30/2004	5/8/1989	13%
<b>'1990</b>							
12	LACKS INDUSTRIES INC MID 006 014 666			1/26/1990		1/26/1990	15%
13	MACDERMID INC MID 005 338 371	10/3/1990			8/3/1999	10/3/1990	16%
14	PFIZER GLOBAL MANUFACT MID 006 013 643	10/3/1990	9/30/2001			10/3/1990	17%
<b>/1991</b>							
15	GM PLANT SAGINAW MALLE MID 005 356 696				11/8/1991	11/8/1991	18%
<b>/1992</b>							
16	GM FLINT VAN SLYKE COMP MID 005 356 951				3/31/1992	3/31/1992	20%

OP LIC ISSUE / PROJ : operating license issuance or projected issuance date  
PCP ISSUE / PROJ: post closure plan issuance or projected issuance date  
CAO ISSUE / PROJ : corrective action order issuance or projected issuance date  
CC ACCEPTED / PROJ: clean closure accepted or projected acceptance date

DATE: date of administrative control in place  
CUM % : cumulative percentage of baseline facilities with controls in place accomplished  
LEAD : lead regulatory agency

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For the GPRA Controls In Place Baseline, shows the actual and projected accomplishment dates in each calendar year, and the resulting cumulative percentage of the baseline met. Operating Licenses issued after 1/1/87 have corrective action requirements and are considered met for GPRA "controls in place" purposes. Date Done = 1/1/10 means the projected date is not known but unlikely to be the GPRA Goal Date of 2008. See footnote for examples of approved controls in place. National Goals: 95% of facilities have approved controls in place by 2008 and renew permits/orders to maintain 95% Controls in Place by 2008.

OP LIC ISSUE / PROJ : operating license issuance or projected issuance date  
PCP ISSUE / PROJ: post closure plan issuance or projected issuance date  
CAO ISSUE / PROJ : corrective action order issuance or projected issuance date  
CC ACCEPTED / PROJ: clean closure accepted or projected acceptance date

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**TABLE 2.3.2 CONTROLS IN PLACE BY CALENDAR YEAR : FY06-FY08 BASELINE**

For the GPRA Controls In Place Baseline, shows the actual and projected accomplishment dates in each calendar year, and the resulting cumulative percentage of the baseline met. Operating Licenses issued after 1/1/87 have corrective action requirements and are considered met for GPRA "controls in place" purposes. Date Done = 1/1/10 means the projected date is not known but unlikely to be the GPRA Goal Date of 2008. See footnote for examples of approved controls in place. National Goals: 95% of facilities have approved controls in place by 2008 and renew permits/orders to maintain 95% Controls in Place by 2008.

				OP LIC ISSUE / PROJ	PCP ISSUE / PROJ	CAO ISSUE / PROJ	CC ACCEPTED / PROJ	DATE DONE	CUM %
<b>'1998</b>									
33	BASF CORP	MID 048 223 986				12/18/1998	12/25/1988	12/18/1998	40%
34	CYTEC INDUSTRIES INC	MID 005 360 680	3/31/1998	9/30/2008			8/17/2001	3/31/1998	41%
35	DYNECOL INC	MID 074 259 565	3/16/1998	9/30/2008				3/16/1998	43%
36	HOLCIM US INC DUNDEE PL	MID 005 038 500					2/10/1998	2/10/1998	44%
37	MICHIGAN SEAMLESS TUBE	MID 082 767 591			9/24/1998	4/7/2004	2/5/1990	9/24/1998	45%
38	NATIONAL STANDARD NILE	MIT 270 010 549					3/4/1998	3/4/1998	46%
39	PONTIAC ASSEMBLY CENT	MID 005 356 902				9/25/1998	6/27/1991	9/25/1998	48%
<b>/1999</b>									
40	DRUG AND LABORATORY DI	MID 092 947 928	8/10/1999	9/30/2009				8/10/1999	49%
41	DSC TRENTON PLANT-SITE	MID 017 422 304				12/17/1999	9/1/1998	12/17/1999	50%
42	FORMER DETROIT COKE C	MID 099 114 704				10/25/1999		10/25/1999	51%
43	GRANGER GRAND RIVER L	MID 082 771 700	9/30/1999	9/30/2009				9/30/1999	52%
44	HADLEY INDUSTRIES DIV O	MID 982 222 242					4/30/1999	4/30/1999	54%
45	MICHIGAN DISPOSAL WAST	MID 000 724 831	9/30/1999	9/30/2006			9/2/1999	9/30/1999	55%
46	PETRO CHEM PROCESSING	MID 980 615 298	6/16/1999	6/16/2009				6/16/1999	56%
47	UNIVERSITY OF MI BECK R	MIR 000 001 834	7/16/1999	9/30/2009				7/16/1999	57%
<b>/2000</b>									
48	ACCESS BUSINESS GROUP	MID 006 026 793	4/14/2000	4/14/2010				4/14/2000	59%
49	DEARBORN REFINING CO	MID 005 510 805				9/29/2000	9/2/1993	9/29/2000	60%
50	DOW CORNING MIDLAND PL	MID 000 809 632	9/29/2000		4/5/1996		12/16/1992	9/29/2000	61%
51	MI DEPT/ENVIRON QTY STO	MID 980 825 632			8/9/2000	9/30/2000	8/5/1988	8/9/2000	62%
52	MICHIGAN STATE UNIVERSI	MID 053 343 976	9/29/2000					9/29/2000	63%
53	PEPIN IRECO INC	MID 041 413 154					10/17/2000	10/17/2000	65%
54	SEVERSTAL NORTH AMERI	MID 087 738 431				5/1/2000	3/16/1988	5/1/2000	66%
55	TRITON	MID 088 754 668	9/28/2000			3/1/1991	8/15/2003	9/28/2000	67%

OP LIC ISSUE / PROJ : operating license issuance or projected issuance date  
PCP ISSUE / PROJ: post closure plan issuance or projected issuance date  
CAO ISSUE / PROJ : corrective action order issuance or projected issuance date  
CC ACCEPTED / PROJ: clean closure accepted or projected acceptance date

DATE:date of administrative control in place  
CUM % : cummulative percentage of baseline facilities with controls in place accomplished  
LEAD : lead regulatory agency

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**TABLE 2.3.2 CONTROLS IN PLACE BY CALENDAR YEAR : FY06-FY08 BASELINE**

For the GPRA Controls In Place Baseline, shows the actual and projected accomplishment dates in each calendar year, and the resulting cumulative percentage of the baseline met. Operating Licenses issued after 1/1/87 have corrective action requirements and are considered met for GPRA "controls in place" purposes. Date Done = 1/1/10 means the projected date is not known but unlikely to be the GPRA Goal Date of 2008. See footnote for examples of approved controls in place. National Goals: 95% of facilities have approved controls in place by 2008 and renew permits/orders to maintain 95% Controls in Place by 2008.

			OP LIC ISSUE / PROJ	PCP ISSUE / PROJ	CAO ISSUE / PROJ	CC ACCEPTED / PROJ	DATE DONE	CUM %
<b>2001</b>								
56	DETREX CORPORATION SIT	MID 091 605 972	1/31/2001	1/31/2011		3/24/1997	1/31/2001	68%
57	GMC TECHNICAL CENTER-	MID 050 615 996	12/5/2001	6/30/2012			12/5/2001	70%
58	PHARMACIA & UPJOHN CO	MID 000 820 381	3/30/2001	3/31/2001		9/30/1994	3/30/2001	71%
59	SELFRIEDGE AIR NATIONAL	MID 099 113 128				2/5/2001	2/5/2001	72%
60	SYSTECH ENVIRONMENTAL	MID 981 200 835				9/21/2001	9/21/2001	73%
<b>2002</b>								
61	CHEMICAL ANALYTICS INC	MID 985 568 021	9/30/2002	9/30/2012			9/30/2002	74%
62	PERFECT CIRCLE DIVISION	MID 980 499 735			5/30/2002	9/30/2001	5/30/2002	76%
63	SOLUTIA INC-PHOSPHATES/	MID 009 708 678			3/27/2002		3/27/2002	77%
<b>2003</b>								
64	BAYER CROPSCIENCE LP	MID 080 358 351			11/20/2003		11/20/2003	78%
65	DAIMLER CHRYSLER CORP,	MID 990 760 100		9/30/2003	9/30/2003		9/30/2003	79%
66	EQ DETROIT INC	MID 980 991 566	12/12/2003				12/12/2003	80%
67	GAGE PRODUCTS CO	MID 005 338 801	8/4/2003	2/5/2013			8/4/2003	82%
68	RUGGED LINER INC	MID 058 816 927				11/13/2003	11/13/2003	83%
69	TPI PETROLEUM INC	MID 005 358 130	5/18/1982		9/30/2003	1/30/2003	9/30/2003	84%
<b>2004</b>								
70	GREDE VASSAR INC VASSA	MID 005 513 262			9/30/2004	11/9/2004	11/9/2004	85%
71	LACKS INDUSTRIES INC SA	MID 080 359 433			9/30/2004	9/5/1995	9/30/2004	87%
<b>2005</b>								
72	DELPHI ENERGY & CHASSIS	MID 017 079 625		9/30/2005		2/1/1991	9/30/2005	88%
73	DELPHI FLINT EAST - DORT	MID 005 356 647		4/26/2005			4/26/2005	89%
74	WOODLAND MEADOWS LDF	MID 000 810 408	9/12/2005				9/12/2005	90%

OP LIC ISSUE / PROJ : operating license issuance or projected issuance date  
PCP ISSUE / PROJ: post closure plan issuance or projected issuance date  
CAO ISSUE / PROJ : corrective action order issuance or projected issuance date  
CC ACCEPTED / PROJ: clean closure accepted or projected acceptance date

DATE:date of administrative control in place  
CUM % : cumulative percentage of baseline facilities with controls in place accomplished  
LEAD : lead regulatory agency  
\$:special grant funds provided to maintain schedule for these facilities.

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**TABLE 2.3.2 CONTROLS IN PLACE BY CALENDAR YEAR : FY06-FY08 BASELINE**

For the GPRA Controls In Place Baseline, shows the actual and projected accomplishment dates in each calendar year, and the resulting cumulative percentage of the baseline met. Operating Licenses issued after 1/1/87 have corrective action requirements and are considered met for GPRA "controls in place" purposes. Date Done = 1/1/10 means the projected date is not known but unlikely to be the GPRA Goal Date of 2008. See footnote for examples of approved controls in place. National Goals: 95% of facilities have approved controls in place by 2008 and renew permits/orders to maintain 95% Controls in Place by 2008.

	OP LIC ISSUE / PROJ	PCP ISSUE / PROJ	CAO ISSUE / PROJ	CC ACCEPTED / PROJ	DATE DONE	CUM %
<b>2006</b>						
75	GRAND BLANC LANDFILL	MID 980 506 265				
			9/30/2006			
76	PERMA FIX OF MICHIGAN IN	MID 096 963 194	6/8/1982			
				9/20/2006	1/13/2006	
					9/30/2006	91%
					9/20/2006	93%
<b>2007</b>						
77	KURDZIEL IRON OF ROTHB	MID 006 025 217		3/31/2007		
					3/31/2007	94%
78	VISTEON CORPORATION SA	MID 009 305 665	9/28/1982	3/31/2007		
					3/31/2007	95%
<b>2008</b>						
79	GMPT FLINT NORTH SITE-M	MID 005 356 712				
				9/30/2008	9/30/2008	96%
<b>2010</b>						
80	GMC METAL FABRICATING	MID 005 356 886				
					1/1/2010	98%
81	HENKEL SURFACE TECHNO	MID 058 723 867				
					1/1/2010	99%
82	KHI INC	MID 006 020 895				
				9/30/2010	9/30/201	100%

OP LIC ISSUE / PROJ : operating license issuance or projected issuance date  
PCP ISSUE / PROJ: post closure plan issuance or projected issuance date  
CAO ISSUE / PROJ : corrective action order issuance or projected issuance date  
CC ACCEPTED / PROJ: clean closure accepted or projected acceptance date

DATE: date of administrative control in place  
CUM % : cumulative percentage of baseline facilities with controls in place accomplished  
LEAD : lead regulatory agency  
\$: special grant funds provided to maintain schedule for these facilities.

## 2.4 CORRECTIVE ACTION

### Goals

The federal GPRA goals for corrective action at hazardous waste facilities as specified in OSWER FY07 National Program Guidance are:

*Substantial progress towards achieving the 2008 GPRA goals is the highest priority of the RCRA corrective action program for FY 2007. The 2008 GPRA goals, which build on the success achieved in 2006, are as follows:*

- *Assess 100 percent of RCRA baseline facilities (assess means that enough information to rank the site has been gathered).*
- *Control all identified unacceptable human exposures from site contamination to health-based levels for current land and/or ground-water use conditions at 95 percent of RCRA baseline facilities.*
- *Control the migration of contaminated ground water at 80 percent of RCRA baseline facilities.*
- *Select final remedies (cleanup targets) at 30 percent of RCRA baseline facilities.*
- *Complete construction of remedies at 20 percent of RCRA baseline facilities.*

*These 2008 national goals are based on a revised corrective action baseline (or universe) of 1,968 facilities that was developed in FY 2004 (herein referred to as the "2008 baseline"). National FY 2007 GPRA goals have been established for each Region based on Regional commitments. These are the goals that the U.S. EPA committed to in the FY 2007 President's Budget.*

### Priority: Corrective Action Baseline

The GPRA "corrective action" baseline consists of selected TSD facilities that the U.S. EPA has prioritized to meet the corrective action goals stated above. This baseline is a subset of the "controls in place" baseline of all TSD facilities subject to be controlled by an administrative mechanism. The "controls in place" baseline was described in detail in Section 2.3.

### Priority: Environmental Indicators (EIs)

The U.S. EPA now relies on performance measures instead of process measures to document the success of the Corrective Action (CA) Program. The RCRA CA Program now tracks EIs as the means by which environmental results are measured. Of the four goals listed for FY08, the first two are environmental indicator goals because they are meant to "indicate" environmental quality at the site.

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RCRA CA EIs are a means of evaluating and reporting on the acceptability of current site conditions (i.e., they are interim milestones and not final remedy or site closure goals). EIs provide an opportunity for facilities and regulators to show meaningful progress that is achievable in the near future. They are a high priority within the U.S. EPA and the highest priority under the RCRA Program. EIs are site-wide determinations; the facility cannot achieve the EI until all aspects of the facility subject to RCRA CA are considered in the determination. These site-wide criteria apply even if another program (e.g., voluntary, unauthorized state, Underground Storage Tank) is working on part of the facility. EIs measure the effectiveness of stabilization actions. Stabilization of these sites is the MDEQ's first priority with limited resources. The MDEQ's focus is to stabilize worst sites instead of final cleanups at fewer sites. These EIs focus on results (i.e., changes in the quality of the environment) and de-emphasize the corrective action process. The EIs reflect "current" conditions (i.e., known/expected at the time of the determination). EIs should reflect all contaminants of concern present above risk-based levels of concern. They are site-wide.

- The Current Human Exposures Under Control (CA725) EI is an assessment of actual current human risks and would typically take the form of a qualitative assessment of the completeness of exposure pathways but, as necessary, may include a traditional Quantitative Risk Assessment.
- The Groundwater Migration Under Control (CA750) EI is strictly a resource protection measure and not a direct measure of human risk. It may include the assessment of impacts of groundwater discharges to surface waters and surface water ecosystems.

Priority: Corrective Action Completion Progress

The U.S. EPA added two goals in FY06 to track the progress of corrective action at the GPRA CA baseline facilities. The two goals are reported in the national RCRA database (RCRAInfo) using the following data elements:

- Date of Remedy Selection (corrective measures imposed) (CA400): The date that the MDEQ or the U.S. EPA formally notifies the RCRA facility to initiate the corrective measure that has been proposed in the notification process and is hereby incorporated into the RCRA facility's permit/order. The "actual date" is the date the permit, permit modification, or enforcement order is issued specifying the corrective measures remedy; or the date a letter to the facility is signed by the Director approving the corrective measures remedy selected in response to a permit, permit modification, or enforcement order; or the date a letter is signed by the Director to the facility owner/operator indicating that further corrective measures are not necessary. The "projected date" is the date the Director is expected to approve the RCRA Facility Investigation document showing no need for corrective measures or the date the facility is expected to be directed to initiate a corrective measures program under a final order/permit.



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- **Date of Certification of Remedy Completion or Construction Completion (CA550):**  
The date on which the MDEQ or the U.S. EPA formally notifies the RCRA facility that they accept its certification that the remedy specifications in the permit/order have been met and that the specified remedy(ies) has been completed, and/or only operation and maintenance requirements remain in order to maintain this level of performance. The "actual date" is the date the Director signs the final order, permit, or written acknowledgement. The "projected date" is the date the Director is expected to sign the final order, permit, or written acknowledgement.

Table 2.4.1 GPRA Corrective Action Baseline by Facility: FY06-FY08 Baseline

The U.S. EPA's GPRA "corrective action baseline" of facilities for which the MDEQ is the lead regulatory agency is listed alphabetically in Table 2.4.1.

This table shows the actual and projected accomplishment dates for each facility, alphabetically, for each of the four corrective action goals stated above.

An explanation of the abbreviated column headings is shown at the bottom of each page of the table.

TABLE 2.4.1 GPRA Corrective Action Baseline by Facility: FY06-FY08 Baseline, follows this page.

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9/25/2006 8:34:04 A **TABLE 2.4.1 GPRA CORRECTIVE ACTION BASELINE BY FACILITY : FY06-FY08 BASELINE**

For the GPRA Controls In Place Baseline, shows the actual and projected accomplishment dates for each facility, alphabetically. Date Done = 1/1/10 means the projected date is not known but unlikely to be the GPRA Goal Date of 2008. See footnote for examples of approved controls in place. National Goals: 1) 95% of baseline with Human Exposures Controlled; 2) 80% of baseline with Groundwater Controlled; 3) 30% of baseline with Final Remedy (cleanup target) Selected; 4) 20% of baseline with Construction Complete.

			EXP CONTROL / PROJ	GW CONTROL / PROJ	SELECT REMEDY / PROJ	CONSTRUCT / PROJ
1	ACCESS BUSINESS GROUP	MID 006 026 793	9/30/2002	8/20/2004	9/30/2006	9/30/2008
2	ALMA FACILITY	MID 005 358 130	9/27/2004	9/16/2004	9/30/2010	9/30/2010
3	AUTOMOTIVE COMPONENT	MID 005 057 005	10/1/2001	3/25/2005 9/30/2008		
4	BAYER CROPSCIENCE LP	MID 080 358 351	9/14/2005	9/23/2004	9/30/2007	9/30/2008
5	BECK ROAD FACILITY	MIR 000 001 834	7/11/2005	7/11/2005	7/11/2005	7/11/2005
6	BLACK RIVER PUBLIC SCH	MID 006 411 953	9/16/2003	9/16/2003	10/6/1998	8/26/2003
7	BLUE COW INC	MID 060 197 662	1/16/1998	1/16/1998	6/13/1996	1/16/1998
8	CYTEC INDUSTRIES INC	MID 005 360 680	9/30/2006	9/30/2008	9/30/2008	9/30/2010
9	DAIMLER CHRYSLER CORP	MID 990 760 100	9/30/2006	9/30/2007	9/30/2007	9/30/2008
10	DETREX CORPORATION SIT	MID 091 605 972	9/30/2006	2/10/2006		
11	DORE INDUSTRIAL INC	MID 005 359 286	9/30/2006	5/31/1990	12/31/1987	9/30/1999
12	DOW CHEMICAL MAIN PLAN	MID 000 724 724	9/30/2010	9/30/2003	11/22/1994	1/28/1999
13	DOW CORNING MIDLAND P	MID 000 809 632	9/24/1999	9/24/1999		
14	DSC LTD TRENTON PLANT-	MID 017 422 304	9/30/2010	9/30/2010	9/30/2010	9/30/2010
15	EDWARDS OIL SERVICES I	MID 088 754 668	7/2/1992	11/22/1993		
16	EI DUPONT DE NEMOURS	MID 005 512 066	3/15/2004	1/30/2006	9/30/2007	9/30/2008
17	EQ RESOURCE RECOVERY	MID 060 975 844	9/24/1999	9/24/1999		
18	FEDERAL-MOGUL CORP	MID 006 021 414				
19	FORD MOTOR CO ALLEN PK	MID 980 568 711	9/30/2006	9/30/2007	9/30/2006	9/30/2006
20	FORMER DETROIT COKE C	MID 099 114 704	9/25/2003			
21	FORMER WYCOFF STEEL I	MID 004 508 628	2/18/1996	2/18/1996	9/30/2005	9/30/2005
22	GENERAL DYNAMICS LAND	MID 006 407 597	7/7/2005	7/7/2005	9/30/2010	9/30/2010
23	GM FLINT VAN SLYKE COM	MID 005 356 951				
24	GM PLANT SAGINAW MALL	MID 005 356 696				
25	GMPT BAY CITY PLANT	MID 005 356 688	9/30/2010	9/30/2010		
26	GRANGER GRAND RIVER L	MID 082 771 700	9/5/2001	9/5/2001	9/30/2006	9/30/2008
27	HONEYWELL INTERNATIONAL	MID 072 575 731				
28	KHI INC	MID 006 020 895	1/16/2001		10/30/1997	1/16/2001
29	KURDZIEL IRON OF ROTHB	MID 006 025 217	7/14/2004	9/1/1990		
30	LACKS INDUSTRIES INC	MID 006 014 666	9/29/2003	9/15/2007	1/26/1990	1/28/1998
31	LAFARGE MIDWEST INC	MID 005 379 607	5/17/2001	5/17/2001	5/17/2001 9/30/2005	5/17/2001 9/30/2005

EXP CONTROL / PROJ : Humand exposures control date/ projected date (CA725)

SELECT REMEDY / PROJ : Select remedy date or projected selection date (CA400)

GW CONTROL / PROJ: Groundwater controlled date or projected control date (CA 750)

CONSTRUCT / PROJ: Construction complete date or projected completion date (CA550)

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9/25/2006 8:34:04 A **TABLE 2.4.1 GPRA CORRECTIVE ACTION BASELINE BY FACILITY : FY06-FY08 BASELINE**

For the GPRA Controls In Place Baseline, shows the actual and projected accomplishment dates for each facility, alphabetically. Date Done = 1/1/10 means the projected date is not known but unlikely to be the GPRA Goal Date of 2008. See footnote for examples of approved controls in place. National Goals: 1) 95% of baseline with Human Exposures Controlled; 2) 80% of baseline with Groundwater Controlled; 3) 30% of baseline with Final Remedy (cleanup target) Selected; 4) 20% of baseline with Construction Complete.

			EXP CONTROL / PROJ	GW CONTROL / PROJ	SELECT REMEDY / PROJ	CONSTRUCT / PROJ
32	MDEQ RRD FORMER PROD	MID 047 153 077	7/14/2000	6/12/2001		
33	MI DEPT/NAT RES STORAG	MID 980 825 632	9/29/2000	9/29/2000	11/15/2005	11/15/2005
34	MICHIGAN SEAMLESS TUBE	MID 082 767 591	9/9/2004	9/30/2005	8/1/2005	
35	NATIONAL STANDARD NILE	MID 005 069 257	9/29/2003	9/20/2004		
36	PEPIN IRECO INC	MID 041 413 154				4/14/1999
37	PERFECT CIRCLE DIVISION	MID 980 499 735	10/3/2002	8/28/2002	9/30/2010	9/30/2010
38	PERMA FIX OF MICHIGAN IN	MID 096 963 194	3/24/2004	9/24/2003	9/30/2008	1/13/2006
39	PFIZER GLOBAL MANUFAC	MID 006 013 643	11/13/2003	9/21/2004	9/30/2008	9/30/2010
40	PHARMACIA & UPJOHN CO	MID 000 820 381	3/29/2001	3/29/2001	9/30/2006	9/30/2006
41	PPG INDUSTRIES INC	MID 048 788 749		9/30/2010	9/30/2010	9/30/2010
42	REALM/COLDWATER ROAD	MID 005 356 860	5/29/1998	5/29/1998	10/29/1992	7/27/2006
43	REICHOLD INC FERNDAL	MID 020 087 128	5/28/1998	4/24/1998	2/23/1999	6/2/1999
44	REMEDICATION & REDEVELO	MID 072 589 328	9/30/2007			
45	RUGGED LINER INC	MID 058 816 927	9/30/2006	9/30/2006	9/30/2007	9/30/2008
46	SAFETY KLEEN SYSTEMS I	MID 981 000 359	5/28/1998	5/28/1998	5/28/1996	4/25/1996
47	SELFRIEDGE AIR NATIONAL	MID 099 113 128	9/29/2004		6/30/2005 7/23/1993	3/23/1998
48	SEVERSTAL NORTH AMERI	MID 087 738 431	2/8/2005	2/8/2005	9/30/2010	9/30/2010
49	THE SUPERIOR IMAGE	MID 005 361 597				
50	TRANSIGN INC	MID 006 007 967	9/30/2008	9/30/2008	9/30/2010	9/30/2010
51	WACKER CHEMICAL CORP	MID 075 400 671	9/30/2007	9/30/2007	9/30/2008	9/30/2010
52	WASTE STORAGE FACILITY	MID 053 343 976	5/29/1998	5/29/1998		2/18/1993
53	WHIRLPOOL CORP ST JOS	MID 005 477 773	2/27/2001	2/27/2001		3/28/2003

EXP CONTROL / PROJ : Human exposures control date/ projected date (CA725)

GW CONTROL / PROJ: Groundwater controlled date or projected control date (CA 750)

SELECT REMEDY / PROJ : Select remedy date or projected selection date (CA400)

CONSTRUCT / PROJ: Construction complete date or projected completion date (CA550)

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**Strategy**

The GPRA "corrective action" baseline consists of selected TSD facilities that the U.S. EPA has prioritized to meet the corrective action goals stated above. The U.S. EPA strategy for achieving the GPRA corrective action goals is to track the rate of progress for each of the four goals for the corrective action baseline facilities. The rate of progress for each of the four goals must be accomplished at a pace that will allow the national goals to be met for each individual goal by FY08.

**Table 2.4.2 GPRA Human Exposures Controlled (CA725): By Calendar Year:  
FY06-FY08 Baseline**

The U.S. EPA's GPRA "corrective action" baseline of facilities for which the MDEQ is the lead regulatory agency is grouped by calendar year in Table 2.4.2. This table presents the same list of facilities as does Table 2.4.1, but it lists the facilities by the year in which the "human exposures controlled" goal was achieved or is projected to be achieved.

This table shows the actual and projected accomplishment dates for each facility, by calendar year, and the resulting cumulative percentage of the baseline met.

An explanation of the abbreviated column headings is shown at the bottom of each page of the table. However, two columns are explained further below.

**Date Done:** This date is selected based from the actual and projected dates that are listed to the left for each facility, unless the "human exposures controlled goal" is not expected to be met by FY08. If the goal is not expected to be met by FY08, a projected date of 2010 is shown as the projected date.

**Cum % Done:** This column shows the percentile of each facility's rank in the schedule and, thus, our chronological progress in meeting the national GPRA goal.

The national goal is to have achieved 95 percent of the facilities with "human exposures controlled" by FY08 (September 30, 2008). The table shows that the MDEQ only expects to achieve "human exposures controlled" for 83 percent of the corrective action baseline facilities by the end of FY08 and, thus, not meet the national goal of 95 percent.

TABLE 2.4.2 GPRA Human Exposures Controlled (CA725): By Calendar Year:  
FY06-FY08 Baseline, follows this page.

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**TABLE 2.4.2 GPRA HUMAN EXPOSURES CONTROLLED (CA725) : BY CALENDAR YEAR : FY06-FY08 BASELINE**

For the GPRA Corrective Action Baseline, shows the actual and projected accomplishment dates in each calendar year, and the resulting cumulative percentage of the baseline met. Date Done = 1/1/10 means the projected date is not known but unlikely to be the GPRA Goal Date of 2008. National Goals: 95% of facilities have human exposures controlled by 2008.

		<b>EXPOSURES CONTROLLED</b>	<b>PROJECTED EXPOSURES CONTROLLED</b>	<b>DATE DONE</b>	<b>CUM % DONE</b>	<b>EPA GPRA LISTS</b>	<b>MICH ADMIN TRACK</b>	<b>LEAD</b>
<b>/1992</b>								
1	EDWARDS OIL SE MID 088 754 668	7/2/1992		7/2/1992	2%	CA, OL	CC	
<b>/1996</b>								
2	FORMER WYCOF MID 004 508 628	2/18/1996		2/18/1996	4%	CA, PC	CAO	
<b>/1998</b>								
3	BLUE COW INC MID 060 197 662	1/16/1998		1/16/1998	6%	CA	VOL	
4	REICHHOLD INC F MID 020 087 128	5/28/1998		5/28/1998	8%	CA	CAO	
5	SAFETY KLEEN S MID 981 000 359	5/28/1998		5/28/1998	9%	CA	VOL	
6	REALM/COLDWAT MID 005 356 860	5/29/1998		5/29/1998	11%	CA, PC	CAO	
7	WASTE STORAGE MID 053 343 976	5/29/1998		5/29/1998	13%	CA, OL	OL	
<b>/1999</b>								
8	DOW CORNING M MID 000 809 632	9/24/1999		9/24/1999	15%	CA, OL	OL	
9	EQ RESOURCE R MID 060 975 844	9/24/1999		9/24/1999	17%	CA, OL	OL	
<b>/2000</b>								
10	MDEQ RRD FORM MID 047 153 077	7/14/2000		7/14/2000	19%	CA, PC	PFC	
11	MI DEPT/NAT RES MID 980 825 632	9/29/2000		9/29/2000	21%	CA, PC	PCP	
<b>/2001</b>								
12	KHI INC MID 006 020 895	1/16/2001		1/16/2001	23%	CA, PC	CC	
13	WHIRLPOOL COR MID 005 477 773	2/27/2001		2/27/2001	25%	CA	VOL	
14	PHARMACIA & UP MID 000 820 381	3/29/2001		3/29/2001	26%	CA, OL	OL	
15	LAFARGE MIDWE MID 005 379 607	5/17/2001		5/17/2001	28%	CA, OL	CC	
16	GRANGER GRAN MID 082 771 700	9/5/2001		9/5/2001	30%	CA, PC	PCOL	
17	AUTOMOTIVE CO MID 005 057 005	10/1/2001		10/1/2001	32%	CA, PC	PCOL	
<b>/2002</b>								
18	ACCESS BUSINE MID 006 026 793	9/30/2002		9/30/2002	34%	CA, OL	OL	
19	PERFECT CIRCLE MID 980 499 735	10/3/2002		10/3/2002	36%	CA, PC	PCP	
<b>/2003</b>								
20	BLACK RIVER PU MID 006 411 953	9/16/2003		9/16/2003	38%		VOL	
GPRA.mdb\RC725 DATE R		<b>TOTAL NUMBER OF FACILITIES:</b>			<b>53</b>			

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**TABLE 2.4.2 GPRA HUMAN EXPOSURES CONTROLLED (CA725) : BY CALENDAR YEAR : FY06-FY08 BASELINE**

For the GPRA Corrective Action Baseline, shows the actual and projected accomplishment dates in each calendar year, and the resulting cumulative percentage of the baseline met. Date Done = 1/1/10 means the projected date is not known but unlikely to be the GPRA Goal Date of 2008. National Goals: 95% of facilities have human exposures controlled by 2008.

		EXPOSURES CONTROLLED	PROJECTED EXPOSURES CONTROLLED	DATE DONE	CUM % DONE	EPA GPRA LISTS	MICH ADMIN TRACK
FORMER DETROI	MID 099 114 704	9/25/2003		9/25/2003	40%	CA	CAO
LACKS INDUSTRI	MID 006 014 666	9/29/2003		9/29/2003	42%	CA, PC	CAO
NATIONAL STAND	MID 005 069 257	9/29/2003		9/29/2003	43%	CA	CAO
PFIZER GLOBAL	MID 006 013 643	11/13/2003		11/13/2003	45%	CA, OL	PCOL
<b>2004</b>							
EI DUPONT DE NE	MID 005 512 066	3/15/2004		3/15/2004	47%		VOL
PERMA FIX OF MI	MID 096 963 194	3/24/2004		3/24/2004	49%	CA, OL	OL
KURDZIEL IRON O	MID 006 025 217	7/14/2004		7/14/2004	51%	CA, PC	PCP
MICHIGAN SEAML	MID 082 767 591	9/9/2004		9/9/2004	53%	CA, PC	CAO
ALMA FACILITY	MID 005 358 130	9/27/2004		9/27/2004	55%	CA, PC	CAO
SELFRIDGE AIR N	MID 099 113 128	9/29/2004		9/29/2004	57%	CA	CAO
<b>2005</b>							
SEVERSTAL NOR	MID 087 738 431	2/8/2005		2/8/2005	58%	CA	CAO
GENERAL DYNAM	MID 006 407 597	7/13/2005		7/13/2005	60%	CA	VOL
BAYER CROPSCI	MID 080 358 351		9/30/2005	9/30/2005	62%	CA, OL	CAO
<b>2006</b>							
BECK ROAD FACI	MIR 000 001 834		9/30/2006	9/30/2006	64%	OL	OL
CYTEC INDUSTRI	MID 005 360 680		9/30/2006	9/30/2006	66%	OL	CC
DAIMLER CHRYSL	MID 990 760 100		9/30/2006	9/30/2006	68%	PC	PCP
DETREX CORPOR	MID 091 605 972		9/30/2006	9/30/2006	70%	OL	OL
DORE INDUSTRIA	MID 005 359 286		9/30/2006	9/30/2006	72%		CC
FORD MOTOR CO	MID 980 568 711		9/30/2006	9/30/2006	74%	OL, PC	PCP
RUGGED LINER I	MID 058 816 927		9/30/2006	9/30/2006	75%	PC	CC
<b>2007</b>							
PEPIN IRECO INC	MID 041 413 154			9/30/2007	77%	PC	CC
REMEDIATION &	MID 072 589 328		9/30/2007	9/30/2007	79%	CA, PC	PFC
WACKER CHEMIC	MID 075 400 671		9/30/2007	9/30/2007	81%		CC
<b>2008</b>							
TRANSIGN INC	MID 006 007 967		9/30/2008	9/30/2008	83%		VOL
<b>2010</b>							

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TOTAL NUMBER OF FACILITIES:

53

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**TABLE 2.4.2 GPRA HUMAN EXPOSURES CONTROLLED (CA725) : BY CALENDAR YEAR : FY06-FY08 BASELINE**

For the GPRA Corrective Action Baseline, shows the actual and projected accomplishment dates in each calendar year, and the resulting cumulative percentage of the baseline met. Date Done = 1/1/10 means the projected date is not known but unlikely to be the GPRA Goal Date of 2008. National Goals: 95% of facilities have human exposures controlled by 2008.

EXPOSURES CONTROLLED	PROJECTED EXPOSURES CONTROLLED	DATE DONE	CUM % DONE	EPA GPRA LISTS	MICH ADMIN TRACK
CONTAINER SPE MID 005 361 597		1/1/2010	85%		CC
FEDERAL-MOGUL MID 006 021 414		1/1/2010	87%		CC
GM FLINT VAN SL MID 005 356 951		1/1/2010	89%		CC
GM PLANT SAGIN MID 005 356 696		1/1/2010	91%		CC
HONEYWELL INT MID 072 575 731		1/1/2010	92%		CC
DOW CHEMICAL MID 000 724 724	9/30/2010	9/30/2010	94%	CA, OL	OL
DSC LTD TRENTO MID 017 422 304	9/30/2010	9/30/2010	96%	CA, PC	CAO
GMPT BAY CITY P MID 005 356 688	9/30/2010	9/30/2010	98%		CC
PPG INDUSTRIES MID 048 788 749	9/30/2010	9/30/2010	100%		CC

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Table 2.4.3 GPRA Release to Groundwater Controlled (CA750): By Calendar Year:  
FY06-FY08 Baseline

The U.S. EPA's GPRA "corrective action" baseline of facilities for which MDEQ is the lead regulatory agency is grouped by calendar year in Table 2.4.3. This table presents the same list of facilities as does Table 2.4.1, but it lists the facilities by the year in which the "release to groundwater controlled" goal was achieved or is projected to be achieved.

This table shows the actual and projected accomplishment dates for each facility, by calendar year, and the resulting cumulative percentage of the baseline met.

An explanation of the abbreviated column headings is shown at the bottom of each page of the table. However, two columns are explained further below.

**Date Done:** This date is selected based from the actual and projected dates that are listed to the left for each facility, unless the "release to groundwater controlled goal" is not expected to be met by FY08. If the goal is not expected to be met by FY08, a projected date of 2010 is shown as the projected date.

**Cum % Done:** This column shows the percentile of each facility's rank in the schedule and, thus, our chronological progress in meeting the national GPRA goal.

The national goal is to have achieved 80 percent of the facilities with "release to groundwater controlled" by FY08 (September 30, 2008). The table shows that the MDEQ expects to achieve "release to groundwater controlled" for 77 percent of the corrective action baseline facilities by the end of FY08 and, thus, not meet the national goal of 80 percent.

TABLE 2.4.3 GPRA Release to Groundwater Controlled (CA750): By Calendar Year: FY06-FY08 Baseline, follows this page.



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**TABLE 2.4.3 GPRA RELEASE TO GROUNDWATER CONTROLLED (CA750) : BY CALENDAR YEAR : FY06-FY08 BASELINE**

For the GPRA Corrective Action Baseline, shows the actual and projected accomplishment dates in each calendar year, and the resulting cumulative percentage of the baseline met. Date Done = 1/1/10 mean the projected date is not known but unlikely to be the GPRA Goal Date of 2008. National Goals: 80% of facilities have groundwater controlled by 2008.

			<b>GROUND WATER CONTROLLED</b>	<b>PROJECTED GROUND WATER CONTROLLED</b>	<b>DATE</b>	<b>CUM % DONE</b>	<b>EPA GPRA LISTS</b>	<b>MICH ADMIN TRACK</b>	<b>LEAD</b>
<b>/1990</b>									
1	DORE INDUSTRIA	MID 005 359 286	5/31/1990		5/31/1990	2%		CC	
2	KURDZIEL IRON	MID 006 025 217	9/1/1990		9/1/1990	4%	CA, PC	PCP	
<b>/1993</b>									
3	EDWARDS OIL SE	MID 088 754 668	11/22/1993		11/22/1993	6%	CA, OL	CC	
<b>/1996</b>									
4	FORMER WYCOF	MID 004 508 628	2/18/1996		2/18/1996	8%	CA, PC	CAO	
<b>/1998</b>									
5	BLUE COW INC	MID 060 197 662	1/16/1998		1/16/1998	9%	CA	VOL	
6	REICHHOLD INC	MID 020 087 128	4/24/1998		4/24/1998	11%	CA	CAO	
7	SAFETY KLEEN S	MID 981 000 359	5/28/1998		5/28/1998	13%	CA	VOL	
8	REALM/COLDWA	MID 005 356 860	5/29/1998		5/29/1998	15%	CA, PC	CAO	
9	WASTE STORAG	MID 053 343 976	5/29/1998		5/29/1998	17%	CA, OL	OL	
<b>/1999</b>									
10	DOW CORNING M	MID 000 809 632	9/24/1999		9/24/1999	19%	CA, OL	OL	
11	EQ RESOURCE R	MID 060 975 844	9/24/1999		9/24/1999	21%	CA, OL	OL	
<b>/2000</b>									
12	MI DEPT/NAT RES	MID 980 825 632	9/29/2000		9/29/2000	23%	CA, PC	PCP	
<b>/2001</b>									
13	WHIRLPOOL COR	MID 005 477 773	2/27/2001		2/27/2001	25%	CA	VOL	
14	PHARMACIA & UP	MID 000 820 381	3/29/2001		3/29/2001	26%	CA, OL	OL	
15	LAFARGE MIDWE	MID 005 379 607	5/17/2001		5/17/2001	28%	CA, OL	CC	
16	MDEQ RRD FORM	MID 047 153 077	6/12/2001		6/12/2001	30%	CA, PC	PFC	
17	GRANGER GRAN	MID 082 771 700	9/5/2001		9/5/2001	32%	CA, PC	PCOL	
<b>/2002</b>									
18	PERFECT CIRCLE	MID 980 499 735	8/28/2002		8/28/2002	34%	CA, PC	PCP	

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**TOTAL NUMBER OF FACILITIES: 53**

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**TABLE 2.4.3 GPRA RELEASE TO GROUNDWATER CONTROLLED (CA750) : BY CALENDAR YEAR : FY06-FY08 BASELINE**

For the GPRA Corrective Action Baseline, shows the actual and projected accomplishment dates in each calendar year, and the resulting cumulative percentage of the baseline met. Date Done = 1/1/10 mean the projected date is not known but unlikely to be the GPRA Goal Date of 2008. National Goals: 80% of facilities have groundwater controlled by 2008.

			GROUND WATER CONTROLLED	PROJECTED GROUND WATER CONTROLLED	DATE	CUM % DONE	EPA GPRA LISTS	MICH ADMIN TRACK	LEAD
<b>/2003</b>									
19	BLACK RIVER PU	MID 006 411 953	9/16/2003		9/16/2003	36%			VOL
20	PERMA FIX OF MI	MID 096 963 194	9/24/2003		9/24/2003	38%	CA, OL	OL	
21	DOW CHEMICAL	MID 000 724 724	9/30/2003		9/30/2003	40%	CA, OL	OL	
<b>/2004</b>									
22	ACCESS BUSINE	MID 006 026 793	8/20/2004		8/20/2004	42%	CA, OL	OL	
23	ALMA FACILITY	MID 005 358 130	9/16/2004		9/16/2004	43%	CA, PC	CAO	
24	NATIONAL STAND	MID 005 069 257	9/20/2004		9/20/2004	45%	CA	CAO	
25	PFIZER GLOBAL	MID 006 013 643	9/21/2004		9/21/2004	47%	CA, OL	PCOL	
26	BAYER CROPSCI	MID 080 358 351	9/23/2004		9/23/2004	49%	CA, OL	CAO	
<b>/2005</b>									
27	SEVERSTAL NOR	MID 087 738 431	2/8/2005		2/8/2005	51%	CA	CAO	
28	AUTOMOTIVE CO	MID 005 057 005	3/25/2005	9/30/2008	3/25/2005	53%	CA, PC	PCOL	
29	SELFRIEDGE AIR N	MID 099 113 128		6/30/2005	6/30/2005	55%	CA	CAO	
30	GENERAL DYNAM	MID 006 407 597	7/7/2005		7/7/2005	57%	CA	VOL	
31	BECK ROAD FACI	MIR 000 001 834	7/11/2005		7/11/2005	58%	OL	OL	
32	MICHIGAN SEAML	MID 082 767 591	9/30/2005	8/1/2005	9/30/2005	60%	CA, PC	CAO	
<b>/2006</b>									
33	EI DUPONT DE N	MID 005 512 066	1/30/2006		1/30/2006	62%			VOL
34	DETREX CORPOR	MID 091 605 972	2/10/2006		2/10/2006	64%	OL	OL	
35	RUGGED LINER I	MID 058 816 927		9/30/2006	9/30/2006	66%	PC	CC	
<b>/2007</b>									
36	LACKS INDUSTRI	MID 006 014 666		9/15/2007	9/15/2007	68%	CA, PC	CAO	
37	DAIMLER CHRYS	MID 990 760 100		9/30/2007	9/30/2007	70%	PC	PCP	
38	FORD MOTOR CO	MID 980 568 711		9/30/2007	9/30/2007	72%	OL, PC	PCP	
39	WACKER CHEMIC	MID 075 400 671		9/30/2007	9/30/2007	74%		CC	
<b>/2008</b>									
40	CYTEC INDUSTRI	MID 005 360 680		9/30/2008	9/30/2008	75%	OL	CC	
41	TRANSIGN INC	MID 006 007 967		9/30/2008	9/30/2008	77%		VOL	

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**TOTAL NUMBER OF FACILITIES: 53**

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**TABLE 2.4.3 GPRA RELEASE TO GROUNDWATER CONTROLLED (CA750) : BY CALENDAR YEAR : FY06-FY08 BASELINE**

For the GPRA Corrective Action Baseline, shows the actual and projected accomplishment dates in each calendar year, and the resulting cumulative percentage of the baseline met. Date Done = 1/1/10 mean the projected date is not known but unlikely to be the GPRA Goal Date of 2008. National Goals: 80% of facilities have groundwater controlled by 2008.

		<b>GROUND WATER CONTROLLED</b>	<b>PROJECTED GROUND WATER CONTROLLED</b>	<b>DATE</b>	<b>CUM % DONE</b>	<b>EPA GPRA LISTS</b>	<b>MICH ADMIN TRACK</b>	<b>LEAD</b>
<b>/2010</b>								
42	FEDERAL-MOGUL	MID 006 021 414		1/1/2010	<b>79%</b>			CC
43	FORMER DETROI	MID 099 114 704		1/1/2010	<b>81%</b>	CA		CAO
44	GM FLINT VAN SL	MID 005 356 951		1/1/2010	<b>83%</b>			CC
45	GM PLANT SAGIN	MID 005 356 696		1/1/2010	<b>85%</b>			CC
46	HONEYWELL INT	MID 072 575 731		1/1/2010	<b>87%</b>			CC
47	KHI INC	MID 006 020 895		1/1/2010	<b>89%</b>	CA, PC		CC
48	PEPIN IRECO INC	MID 041 413 154		1/1/2010	<b>91%</b>	PC		CC
49	REMEDIATION &	MID 072 589 328		1/1/2010	<b>92%</b>	CA, PC		PFC
50	THE SUPERIOR I	MID 005 361 597		1/1/2010	<b>94%</b>			CC
51	DSC LTD TRENTO	MID 017 422 304	9/30/2010	9/30/2010	<b>96%</b>	CA, PC		CAO
52	GMPT BAY CITY P	MID 005 356 688	9/30/2010	9/30/2010	<b>98%</b>			CC
53	PPG INDUSTRIES	MID 048 788 749	9/30/2010	9/30/2010	<b>100%</b>			CC

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**Table 2.4.4 GPRA Remedy Selected (CA400) by Calendar Year: FY06-FY08 Baseline**

The U.S. EPA's GPRA "corrective action" baseline of facilities for which the MDEQ is the lead regulatory agency is grouped by calendar year in Table 2.4.4. This table presents the same list of facilities as does Table 2.4.1, but it lists the facilities by the year in which the "remedy selected" goal was achieved or is projected to be achieved.

This table shows the actual and projected accomplishment dates for each facility, by calendar year, and the resulting cumulative percentage of the baseline met.

An explanation of the abbreviated column headings is shown at the bottom of each page of the table. However, two columns are explained further below.

**Date Done:** This date is selected based from the actual and projected dates that are listed to the left for each facility, unless the "remedy goal" is not expected to be met by FY08. If the goal is not expected to be met by FY08, a projected date of 2010 is shown as the projected date.

**Cum % Done:** This column shows the percentile of each facility's rank in the schedule and, thus, our chronological progress in meeting the national GPRA goal.

The national goal is to have achieved 30 percent of the facilities with "remedy selected" by FY08 (September 30, 2008). The table shows that the MDEQ expects to achieve "remedy selected" for 49 percent of the corrective action baseline facilities by the end of FY08 and, thus, meet the national goal of 30 percent.

TABLE 2.4.4 GPRA Remedy Selected (CA400) by Calendar Year: FY06-FY08 Baseline, follows this page.

9/25/2006 9:11:03 A **TABLE 2.4.4 GPRA REMEDY SELECTED (CA400) BY CALENDAR YEAR : FY06-FY08 BASELINE**

For the GPRA Corrective Action Baseline, shows the actual and projected accomplishment dates in each calendar year, and the resulting cumulative percentage of the baseline met. Date Done = 1/1/10 mean the projected date is not known but unlikely to be the GPRA Goal Date of 2008. National Goal: 30% of baseline facilities with Final Remedy Selected by 2008.

				<b>SELECT REMEDY</b>	<b>PROJECTED SELECT REMEDY</b>	<b>DATE</b>	<b>CUM % DONE</b>	<b>EPA GPRA LISTS</b>	<b>MICH ADMIN TRACK</b>	<b>LEAD</b>
<b>/1987</b>										
1	DORE INDUSTRIA	MID 005 359 286	12/31/1987			12/31/1987	<b>2%</b>		CC	
<b>/1990</b>										
2	LACKS INDUSTRI	MID 006 014 666	1/26/1990			1/26/1990	<b>4%</b>	CA, PC	CAO	
<b>/1992</b>										
3	REALM/COLDWA	MID 005 356 860	10/29/1992			10/29/1992	<b>6%</b>	CA, PC	CAO	
<b>/1993</b>										
4	SELFRIDGE AIR N	MID 099 113 128	7/23/1993			7/23/1993	<b>8%</b>	CA	CAO	
<b>/1994</b>										
5	DOW CHEMICAL	MID 000 724 724	11/22/1994			11/22/1994	<b>9%</b>	CA, OL	OL	
<b>/1996</b>										
6	SAFETY KLEEN S	MID 981 000 359	5/28/1996			5/28/1996	<b>11%</b>	CA	VOL	
7	BLUE COW INC	MID 060 197 662	6/13/1996			6/13/1996	<b>13%</b>	CA	VOL	
<b>/1997</b>										
8	KHI INC	MID 006 020 895	10/30/1997			10/30/1997	<b>15%</b>	CA, PC	CC	
<b>/1998</b>										
9	BLACK RIVER PU	MID 006 411 953	10/6/1998			10/6/1998	<b>17%</b>		VOL	
<b>/1999</b>										
10	REICHHOLD INC	MID 020 087 128	2/23/1999			2/23/1999	<b>19%</b>	CA	CAO	
<b>/2001</b>										
11	LAFARGE MIDWE	MID 005 379 607	5/17/2001	9/30/2005	5/17/2001		<b>21%</b>	CA, OL	CC	
<b>/2005</b>										
12	BECK ROAD FACI	MIR 000 001 834	7/11/2005		7/11/2005		<b>23%</b>	OL	OL	
13	FORMER WYCOF	MID 004 508 628		9/30/2005	9/30/2005		<b>25%</b>	CA, PC	CAO	

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**TOTAL NUMBER OF FACILITIES: 53**

9/25/2006 9:11:05 A **TABLE 2.4.4 GPRA REMEDY SELECTED (CA400) BY CALENDAR YEAR : FY06-FY08 BASELINE**

For the GPRA Corrective Action Baseline, shows the actual and projected accomplishment dates in each calendar year, and the resulting cumulative percentage of the baseline met. Date Done = 1/1/10 mean the projected date is not known but unlikely to be the GPRA Goal Date of 2008. National Goal: 30% of baseline facilities with Final Remedy Selected by 2008.

			<b>SELECT REMEDY</b>	<b>PROJECTED SELECT REMEDY</b>	<b>DATE</b>	<b>CUM % DONE</b>	<b>EPA GPRA LISTS</b>	<b>MICH ADMIN TRACK</b>	<b>LEAD</b>
14	MI DEPT/NAT RES	MID 980 825 632	11/15/2005		11/15/2005	<b>26%</b>	CA, PC	PCP	
<b>/2006</b>									
15	ACCESS BUSINE	MID 006 026 793		9/30/2006	9/30/2006	<b>28%</b>	CA, OL	OL	
16	FORD MOTOR CO	MID 980 568 711		9/30/2006	9/30/2006	<b>30%</b>	OL, PC	PCP	
17	GRANGER GRAN	MID 082 771 700		9/30/2006	9/30/2006	<b>32%</b>	CA, PC	PCOL	
18	PHARMACIA & UP	MID 000 820 381		9/30/2006	9/30/2006	<b>34%</b>	CA, OL	OL	
<b>/2007</b>									
19	BAYER CROPSCI	MID 080 358 351		9/30/2007	9/30/2007	<b>36%</b>	CA, OL	CAO	
20	DAIMLER CHRYS	MID 990 760 100		9/30/2007	9/30/2007	<b>38%</b>	PC	PCP	
21	RUGGED LINER I	MID 058 816 927		9/30/2007	9/30/2007	<b>40%</b>	PC	CC	
<b>/2008</b>									
22	CYTEC INDUSTRI	MID 005 360 680		9/30/2008	9/30/2008	<b>42%</b>	OL	CC	
23	EI DUPONT DE N	MID 005 512 066		9/30/2008	9/30/2008	<b>43%</b>		VOL	
24	PERMA FIX OF MI	MID 096 963 194		9/30/2008	9/30/2008	<b>45%</b>	CA, OL	OL	
25	PFIZER GLOBAL	MID 006 013 643		9/30/2008	9/30/2008	<b>47%</b>	CA, OL	PCOL	
26	WACKER CHEMIC	MID 075 400 671		9/30/2008	9/30/2008	<b>49%</b>		CC	
<b>/2010</b>									
27	AUTOMOTIVE CO	MID 005 057 005			1/1/2010	<b>51%</b>	CA, PC	PCOL	
28	DETREX CORPOR	MID 091 605 972			1/1/2010	<b>53%</b>	OL	OL	
29	DOW CORNING M	MID 000 809 632			1/1/2010	<b>55%</b>	CA, OL	OL	
30	EDWARDS OIL SE	MID 088 754 668			1/1/2010	<b>57%</b>	CA, OL	CC	
31	EQ RESOURCE R	MID 060 975 844			1/1/2010	<b>58%</b>	CA, OL	OL	
32	FEDERAL-MOGUL	MID 006 021 414			1/1/2010	<b>60%</b>		CC	
33	FORMER DETROI	MID 099 114 704			1/1/2010	<b>62%</b>	CA	CAO	
34	GM FLINT VAN SL	MID 005 356 951			1/1/2010	<b>64%</b>		CC	
35	GM PLANT SAGIN	MID 005 356 696			1/1/2010	<b>66%</b>		CC	
36	GMPT BAY CITY P	MID 005 356 688			1/1/2010	<b>68%</b>		CC	
37	HONEYWELL INT	MID 072 575 731			1/1/2010	<b>70%</b>		CC	
38	KURDZIEL IRON	MID 006 025 217			1/1/2010	<b>72%</b>	CA, PC	PCP	
39	MDEQ RRD FORM	MID 047 153 077			1/1/2010	<b>74%</b>	CA, PC	PFC	
40	MICHIGAN SEAML	MID 082 767 591			1/1/2010	<b>75%</b>	CA, PC	CAO	

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**TOTAL NUMBER OF FACILITIES: 53**

9/25/2006 9:11:05 A **TABLE 2.4.4 GPRA REMEDY SELECTED (CA400) BY CALENDAR YEAR : FY06-FY08 BASELINE**

For the GPRA Corrective Action Baseline, shows the actual and projected accomplishment dates in each calendar year, and the resulting cumulative percentage of the baseline met. Date Done = 1/1/10 mean the projected date is not known but unlikely to be the GPRA Goal Date of 2008. National Goal: 30% of baseline facilities with Final Remedy Selected by 2008.

		<b>SELECT REMEDY</b>	<b>PROJECTED SELECT REMEDY</b>	<b>DATE</b>	<b>CUM % DONE</b>	<b>EPA GPRA LISTS</b>	<b>MICH ADMIN TRACK</b>	<b>LEAD</b>
41	NATIONAL STAND	MID 005 069 257		1/1/2010	<b>77%</b>	CA	CAO	
42	PEPIN IRECO INC	MID 041 413 154		1/1/2010	<b>79%</b>	PC	CC	
43	REMEDIATION &	MID 072 589 328		1/1/2010	<b>81%</b>	CA, PC	PFC	
44	THE SUPERIOR I	MID 005 361 597		1/1/2010	<b>83%</b>		CC	
45	WASTE STORAG	MID 053 343 976		1/1/2010	<b>85%</b>	CA, OL	OL	
46	WHIRLPOOL COR	MID 005 477 773		1/1/2010	<b>87%</b>	CA	VOL	
47	ALMA FACILITY	MID 005 358 130	9/30/2010	9/30/2010	<b>89%</b>	CA, PC	CAO	
48	DSC LTD TRENTO	MID 017 422 304	9/30/2010	9/30/2010	<b>91%</b>	CA, PC	CAO	
49	GENERAL DYNAM	MID 006 407 597	9/30/2010	9/30/2010	<b>92%</b>	CA	VOL	
50	PERFECT CIRCLE	MID 980 499 735	9/30/2010	9/30/2010	<b>94%</b>	CA, PC	PCP	
51	PPG INDUSTRIES	MID 048 788 749	9/30/2010	9/30/2010	<b>96%</b>		CC	
52	SEVERSTAL NOR	MID 087 738 431	9/30/2010	9/30/2010	<b>98%</b>	CA	CAO	
53	TRANSIGN INC	MID 006 007 967	9/30/2010	9/30/2010	<b>100%</b>		VOL	

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2.4 Corrective Action

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**Table 2.4.5 GPRA Complete Construction (CA550): By Fiscal Year: FY06-FY08  
Baseline**

The U.S. EPA's GPRA "corrective action" baseline of facilities for which the MDEQ is the lead regulatory agency is grouped by calendar year in Table 2.4.5. This table presents the same list of facilities as does Table 2.4.1, but it lists the facilities by the year in which the "complete construction" goal was achieved or is projected to be achieved.

This table shows the actual and projected accomplishment dates for each facility, by calendar year, and the resulting cumulative percentage of the baseline met.

An explanation of the abbreviated column headings is shown at the bottom of each page of the table. However, two columns are explained further below.

**Date Done:** This date is selected based from the actual and projected dates that are listed to the left for each facility, unless the "complete construction goal" is not expected to be met by FY08. If the goal is not expected to be met by FY08, a projected date of 2010 is shown as the projected date.

**Cum % Done:** This column shows the percentile of each facility's rank in the schedule and, thus, our chronological progress in meeting the national GPRA goal.

The national goal is to have achieved 20 percent of the facilities with "construction complete" by FY08 (September 30, 2008). The table shows that the MDEQ expects to achieve "construction complete" for 49 percent of the corrective action baseline facilities by the end of FY08 and, thus, meet the national goal of 20 percent.

TABLE 2.4.5 GPRA Complete Construction (CA550): By Fiscal Year: FY06-FY08  
Baseline, follows this page.



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**TABLE 2.4.5 GPRA COMPLETE CONSTRUCTION (CA550) : BY FISCAL YEAR : FY06-FY08 BASELINE**

For the GPRA Corrective Action Baseline, shows the actual and projected accomplishment dates in each calendar year, and the resulting cumulative percentage of the baseline met. Date Done = 1/1/10 mean the projected date is not known but unlikely to be the GPRA Goal Date of 2008. National Goal: 20% of baseline facilities with Construction Complete by 2008.

			COMPLETE CONSTRUCT	PROJECTED COMPLETE CONSTRUCT	DATE	CUM % DONE	EPA GPRA LISTS	MICH ADMIN TRACK	LEAD
<b>/1993</b>									
1	WASTE STORAG	MID 053 343 976	2/18/1993		2/18/1993	2%	CA, OL	OL	
<b>/1996</b>									
2	SAFETY KLEEN S	MID 981 000 359	4/25/1996		4/25/1996	4%	CA	VOL	
<b>/1998</b>									
3	BLUE COW INC	MID 060 197 662	1/16/1998		1/16/1998	6%	CA	VOL	
4	LACKS INDUSTRI	MID 006 014 666	1/28/1998		1/28/1998	8%	CA, PC	CAO	
5	SELFRIDGE AIR N	MID 099 113 128	3/23/1998		3/23/1998	9%	CA	CAO	
<b>/1999</b>									
6	DOW CHEMICAL	MID 000 724 724	1/28/1999		1/28/1999	11%	CA, OL	OL	
7	PEPIN IRECO INC	MID 041 413 154	4/14/1999		4/14/1999	13%	PC	CC	
8	REICHHOLD INC	MID 020 087 128	6/2/1999		6/2/1999	15%	CA	CAO	
9	DORE INDUSTRIA	MID 005 359 286	9/30/1999		9/30/1999	17%		CC	
<b>/2001</b>									
10	KHI INC	MID 006 020 895	1/16/2001		1/16/2001	19%	CA, PC	CC	
11	LAFARGE MIDWE	MID 005 379 607	5/17/2001	9/30/2005	5/17/2001	21%	CA, OL	CC	
<b>/2003</b>									
12	WHIRLPOOL COR	MID 005 477 773	3/28/2003		3/28/2003	23%	CA	VOL	
13	BLACK RIVER PU	MID 006 411 953	8/26/2003		8/26/2003	25%		VOL	
<b>/2005</b>									
14	BECK ROAD FACI	MIR 000 001 834	7/11/2005		7/11/2005	26%	OL	OL	
15	FORMER WYCOF	MID 004 508 628		9/30/2005	9/30/2005	28%	CA, PC	CAO	
16	MI DEPT/NAT RES	MID 980 825 632	11/15/2005		11/15/2005	30%	CA, PC	PCP	
<b>/2006</b>									
17	PERMA FIX OF MI	MID 096 963 194	1/13/2006		1/13/2006	32%	CA, OL	OL	
18	REALM/COLDWA	MID 005 356 860	7/27/2006		7/27/2006	34%	CA, PC	CAO	
19	FORD MOTOR CO	MID 980 568 711		9/30/2006	9/30/2006	36%	OL, PC	PCP	

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**TOTAL NUMBER OF FACILITIES: 53**

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**TABLE 2.4.5 GPRA COMPLETE CONSTRUCTION (CA550) : BY FISCAL YEAR : FY06-FY08 BASELINE**

For the GPRA Corrective Action Baseline, shows the actual and projected accomplishment dates in each calendar year, and the resulting cumulative percentage of the baseline met. Date Done = 1/1/10 mean the projected date is not known but unlikely to be the GPRA Goal Date of 2008. National Goal: 20% of baseline facilities with Construction Complete by 2008.

			COMPLETE CONSTRUCT	PROJECTED COMPLETE CONSTRUCT	DATE	CUM % DONE	EPA GPRA LISTS	MICH ADMIN TRACK	LEAD
20	PHARMACIA & UP	MID 000 820 381		9/30/2006	9/30/2006	38%	CA, OL	OL	
<b>/2008</b>									
21	ACCESS BUSINE	MID 006 026 793		9/30/2008	9/30/2008	40%	CA, OL	OL	
22	BAYER CROPSCI	MID 080 358 351		9/30/2008	9/30/2008	42%	CA, OL	CAO	
23	DAIMLER CHRYS	MID 990 760 100		9/30/2008	9/30/2008	43%	PC	PCP	
24	EI DUPONT DE N	MID 005 512 066		9/30/2008	9/30/2008	45%		VOL	
25	GRANGER GRAN	MID 082 771 700		9/30/2008	9/30/2008	47%	CA, PC	PCOL	
26	RUGGED LINER I	MID 058 816 927		9/30/2008	9/30/2008	49%	PC	CC	
<b>/2010</b>									
27	AUTOMOTIVE CO	MID 005 057 005			1/1/2010	51%	CA, PC	PCOL	
28	DETREX CORPOR	MID 091 605 972			1/1/2010	53%	OL	OL	
29	DOW CORNING M	MID 000 809 632			1/1/2010	55%	CA, OL	OL	
30	EDWARDS OIL SE	MID 088 754 668			1/1/2010	57%	CA, OL	CC	
31	EQ RESOURCE R	MID 060 975 844			1/1/2010	58%	CA, OL	OL	
32	FEDERAL-MOGUL	MID 006 021 414			1/1/2010	60%		CC	
33	FORMER DETROI	MID 099 114 704			1/1/2010	62%	CA	CAO	
34	GM FLINT VAN SL	MID 005 356 951			1/1/2010	64%		CC	
35	GM PLANT SAGIN	MID 005 356 696			1/1/2010	66%		CC	
36	GMPT BAY CITY P	MID 005 356 688			1/1/2010	68%		CC	
37	HONEYWELL INT	MID 072 575 731			1/1/2010	70%		CC	
38	KURDZIEL IRON	MID 006 025 217			1/1/2010	72%	CA, PC	PCP	
39	MDEQ RRD FORM	MID 047 153 077			1/1/2010	74%	CA, PC	PFC	
40	MICHIGAN SEAML	MID 082 767 591			1/1/2010	75%	CA, PC	CAO	
41	NATIONAL STAND	MID 005 069 257			1/1/2010	77%	CA	CAO	
42	REMEDIATION &	MID 072 589 328			1/1/2010	79%	CA, PC	PFC	
43	THE SUPERIOR I	MID 005 361 597			1/1/2010	81%		CC	
44	ALMA FACILITY	MID 005 358 130	9/30/2010	9/30/2010		83%	CA, PC	CAO	
45	CYTEC INDUSTRI	MID 005 360 680	9/30/2010	9/30/2010		85%	OL	CC	
46	DSC LTD TRENTO	MID 017 422 304	9/30/2010	9/30/2010		87%	CA, PC	CAO	
47	GENERAL DYNAM	MID 006 407 597	9/30/2010	9/30/2010		89%	CA	VOL	
48	PERFECT CIRCLE	MID 980 499 735	9/30/2010	9/30/2010		91%	CA, PC	PCP	
49	PFIZER GLOBAL	MID 006 013 643	9/30/2010	9/30/2010		92%	CA, OL	PCOL	
50	PPG INDUSTRIES	MID 048 788 749	9/30/2010	9/30/2010		94%		CC	

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**TOTAL NUMBER OF FACILITIES:**

**53**

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**TABLE 2.4.5 GPRA COMPLETE CONSTRUCTION (CA550) : BY FISCAL YEAR : FY06-FY08 BASELINE**

For the GPRA Corrective Action Baseline, shows the actual and projected accomplishment dates in each calendar year, and the resulting cumulative percentage of the baseline met. Date Done = 1/1/10 mean the projected date is not known but unlikely to be the GPRA Goal Date of 2008. National Goal: 20% of baseline facilities with Construction Complete by 2008.

			<b>COMPLETE CONSTRUCT</b>	<b>PROJECTED COMPLETE CONSTRUCT</b>	<b>DATE</b>	<b>CUM % DONE</b>	<b>EPA GPRA LISTS</b>	<b>MICH ADMIN TRACK</b>	<b>LEAD</b>
51	SEVERSTAL NOR	MID 087 738 431		9/30/2010	9/30/2010	<b>96%</b>	CA	CAO	
52	TRANSIGN INC	MID 006 007 967		9/30/2010	9/30/2010	<b>98%</b>		VOL	
53	WACKER CHEMIC	MID 075 400 671		9/30/2010	9/30/2010	<b>100%</b>		CC	

## **2.5 STATE AUTHORIZATION**

### Goal

The U.S. EPA is committed to authorizing state programs and enhancing the U.S. EPA/MDEQ partnership.

### Priorities

Focus identifying opportunities to streamline the authorization process for all rules.

### Strategy

The MDEQ will continue to obtain and maintain the legal authorities necessary to administer a quality state program and conduct the regulatory activities required pursuant to RCRA.

State efforts will focus on the initiation of an administrative rules package that addresses, in part, the balance of RCRA Cluster 14, all of RCRA Cluster 15 and RCRA Cluster 16, and portions of RCRA Cluster 17. The package may also contain state-initiated revisions to improve the overall quality of the rules. Please see Section 3.5, State Authorization, for further discussion on work pertaining to this rules package.

## 2.6 WASTE MINIMIZATION

### Goals

The U.S. EPA FY07 waste generation and recycling goal, *Subobjective 1.1: Reduce Waste Generation and Increase Recycling*, as specified in *OSWER FY07 National Program Guidance*, is:

*The RCRA Program will emphasize its strategy to reduce waste, reduce priority chemicals, and conserve resources. The RCC [Resource Conservation Challenge], one of OSWER's highest priorities, continues to be a principal mechanism for achieving this. Regions will be expected to champion and support the four national focus areas:*

- 1. Recycling of municipal solid waste;*
- 2. Reuse and recycling of industrial by product materials;*
- 3. Reducing priority chemicals in waste streams (covered under subobjective 5.2.2); and*
- 4. Safe recycling of electronics.*

### Priorities

For the WHMD, the hazardous waste Compliance and Enforcement Program will continue to work toward RCRA Implementation Plan goals by encouraging waste minimization at all inspected facilities.

For the MDEQ, Environmental Science and Services Division (ESSD), the Waste Minimization Program will continue their efforts in achieving the goals of the U.S. EPA in shifting focus from TSD facilities to generators and target efforts to prevent waste generation.

Michigan's RCRA Work Plan for Fiscal Year 2007  
Scheduled Activities  
3.1 Introduction

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### 3.1 INTRODUCTION

#### Program Elements

In FY07 the MDEQ will use seven elements in an effective state program to manage hazardous waste through a delegation of RCRA authorities. These seven elements are:

- Compliance and Enforcement
- Permitting and Closure
- Corrective Action
- State Authorization
- Waste Minimization
- Management and Reporting
- Special Initiatives

The MDEQ's program priorities for FY07, including any strategic planning activities, are discussed below. The discussion is organized into the seven program elements listed above.

Previously, in Section 2, Programs and Strategic Planning, of the Work Plan, the following program and strategic planning information were presented for the program elements:

- *2003-2008 EPA Strategic Plan: Direction for the Future, September 30, 2003,*  
<http://www.epa.gov/ocfopage/plan/plan.htm>
- *OSWER FY07 National Program Guidance,*  
[http://www.epa.gov/finance/npmguidance/oswer/2007/2007\\_oswer\\_npmguide.pdf](http://www.epa.gov/finance/npmguidance/oswer/2007/2007_oswer_npmguide.pdf)
- the MDEQ program strategy discussion

In Section 3, Scheduled Activities, of the Work Plan, the following details for each of the seven program elements are presented:

- the MDEQ objective discussion for the program element
- the MDEQ considerations discussion for the program element
- the MDEQ scheduled activities discussion, by office and section

In order to make this Work Plan useful to the staff carrying out the work, the scheduled activities are grouped by offices and sections of the WHMD, where appropriate. This allows the staff to easily see their office's program priorities for the year.

### **3.2 COMPLIANCE AND ENFORCEMENT**

#### Objective

Put forth efforts to prevent environmental harm by encouraging and helping the regulated community to meet legal obligations by identifying and correcting violations that occur in order to foster program integrity and deter future violations or violations by others.

#### Considerations

- 1) Effect of the MDEQ's planning and priority-setting activities, as indicated by its Compliance Monitoring and Enforcement Strategy, in achieving the program element's objective.
- 2) Effect of the MDEQ's compliance monitoring activities as indicated by:
  - a) Status of inspection and record review activities as described in the Work Plan.
  - b) Effect of tools (e.g., inspection checklists) and techniques (e.g., sampling) used in compliance monitoring activities.
  - c) Accuracy and completeness of inspections and follow up.
  - d) Effectiveness of communication with the U.S. EPA on compliance monitoring-related activities.
  - e) Effect of other activities, such as compliance assistance and encouraging the regulated community to meet legal obligations.
- 3) Effect of the MDEQ's enforcement activities as indicated by:
  - a) Nature, timeliness, and appropriateness of enforcement actions.
  - b) Degree of support afforded other enforcement officials.
  - c) Nature of follow up to enforcement actions.
  - d) Effectiveness of communication with the U.S. EPA on enforcement-related issues.

Michigan's RCRA Work Plan for Fiscal Year 2007  
Scheduled Activities  
3.2 Compliance and Enforcement

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Scheduled Activities: District and Field Offices

1) Generator Focus

The MDEQ will continue to focus inspection activities on all categories of generators. Experience continues to demonstrate that the frequency and magnitude of violations increases substantially if inspection frequency extends past three-year cycles for LQGs and hazardous waste transporters and six-year cycles for SQGs. However, while the MDEQ will organize work toward achieving these inspection frequencies, current staffing levels may prevent them from being met. Consequently, decisions about which generators to inspect will be based on risk criteria and management factors as outlined in the WHMD and the specific district's neutral criteria plan.

The generator focus extends to any facility that has obtained an identification number, including conditionally exempt small quantity generators (CESQGs). Staff continues to find that these smaller generators often have both substantial compliance issues to resolve because of a relative lack of sophistication on regulatory requirements and meaningful opportunities for waste reduction. As a result, MDEQ inspections afford effective opportunities to assist facilities to gain compliance status, help identify improved disposal options, and provide information on waste reduction.

As stated in Section 2.2, Compliance and Enforcement, to assist in the overall program effectiveness, the MDEQ will develop and implement plans to provide some emphasis for certain generators and certain transporters. Specifically, subject to the availability of data, the MDEQ will:

- a) Review sites' status in comparison to manifested waste data.
- b) Address sites that have not paid hazardous waste user charges.
- c) Collect manifest data from nonreporting sites.
- d) Review manifest discrepancies during evaluations.

The MDEQ will continue to inspect commercial TSD facilities that can accept waste under Title 42 of the United States Code, Section 9601 *et seq.* (CERCLA), twice per year and any federal TSDs annually. Other TSD compliance evaluation inspections (CEIs) will be assessed individually to determine those for which inspections will provide the greatest environmental benefit. Certain TSD facilities, such as closed or inactive facilities awaiting post-closure licenses, may not be inspected annually.

As stated in Section 2.2, Compliance and Enforcement, the MDEQ will continue efforts to identify and address transporters of hazardous waste without a registration and permit and/or financial responsibility (i.e., fleet liability coverage for accidental occurrences arising from hazardous materials transportation activities). These efforts are expected to identify noncompliances with other transporter requirements.



Michigan's RCRA Work Plan for Fiscal Year 2007  
Scheduled Activities  
3.2 Compliance and Enforcement

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2) Compliance Assistance and Compliance Incentives

Two aspects of the OECA core program are compliance assistance and compliance incentives. The MDEQ does not organize program activities by these terms. Rather, these functions are met through several means:

- a) Interaction by compliance staff on a day-to-day basis assists the regulated community in achieving compliance. For example, inspectors provide written material on common compliance requirements such as secondary containment, manifest tracking, and universal waste.
- b) Individual staff members spend concentrated time preparing compliance information. Such pieces include those noted above as well as tailored presentations to trade associations and interest groups. In addition, the ESSD undertakes complex, detailed projects of compliance assistance/incentives. See also Section 3.6, Waste Minimization, for a discussion of other ESSD compliance assistance and compliance incentive programs.
- c) The MDEQ Web site provides ready access to guidance documents and compliance information. The MDEQ inspectors regularly educate members of the regulated community in the use of the MDEQ Web site and informational systems.
- d) In FY07 continue to upgrade the browser-independent Web site on the Internet that allows the public to view compliance information regarding sites with hazardous waste activity. This will continue to expand the current availability of manifest and general site information available to the public.

3) Program Improvements

The MDEQ will continue to review and, where identified, improve the overall management and operation of the compliance and enforcement program in FY07.

- a) The MDEQ believes that improving the effectiveness and efficiency of inspections is important to meeting overall program goals. Staff continues to concentrate on data quality in the WHMD database, Waste Data System (WDS). This effort will provide accurate data that will be used to improve the consistency and timeliness of inspections and follow up. Inspectors are also developing plans to use this data to further enhance inspections (see above).
- b) WHMD staff will continue to review inspection procedures for effectiveness and refine them for continued improvement, as needed.

## Michigan's RCRA Work Plan for Fiscal Year 2007

### Scheduled Activities

#### 3.2 Compliance and Enforcement

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##### Scheduled Activities: Field Offices and TSU Staff

Approximately 16 full-time equivalent (FTE) positions will be devoted to field inspection activities during FY07. This includes 14 district field staff FTE positions and 2 TSU staff FTE positions. The work by these personnel normally falls into the following categories:

- evaluations at TSD facilities
- evaluations at fully regulated generators
- evaluations at SQGs
- evaluations at CESQGs
- evaluations at other notifiers
- evaluations at transporters
- follow-up inspections
- administrative civil enforcement activities and support
- complaints
- compliance assistance presentation and material development
- compliance monitoring evaluation
- construction inspection
- closure/postclosure in progress inspection
- corrective action in progress inspection
- closure certification inspection
- sampling inspection
- marketer/oil burner inspection
- waste characterization
- joint U.S. EPA/MDEQ inspection
- record review
- waste minimization presentation
- community-based initiative participation
- criminal hauler enforcement (not part of OCI initiative)
- all other criminal case work (including criminal case development, prosecutor acceptance of criminal case, criminal complaint and summons issued, and pretrial and trial stages)
- program improvement activities
- operation and maintenance inspections
- inspections of used oil transporters, used oil transfer facilities, and used oil processor/re-refiners

Michigan's RCRA Work Plan for Fiscal Year 2007  
Scheduled Activities  
3.2 Compliance and Enforcement

**District Field Staff Inspection Schedule**

Field staff will perform the following designated activities during FY07. These designated activities represent 65 percent (8.90) of total (13.71) Compliance Monitoring and Evaluation field FTE positions.

<u>CEI Category</u>	<u>No. of Inspections</u>
TSD Facility	82
LQGs	137
Hazardous Waste Transporter	28
SQGs	313

Eighty-two inspections will be conducted at forty-three TSD facilities. A list of specific facilities and planned inspection quarters is provided below for information only and is not considered a commitment of the Work Plan. The MDEQ does commit to conduct at least one inspection at each federal TSD facility and two inspections at each TSD facility accepting CERCLA waste.

<b>Site ID</b>	<b>Site Name for TSDF</b>	<b>Quarter(s)</b>	<b>District</b>
MID041413154	Pepin Ireco, Inc.	3rd	UP
MID005363114	Arkema, Inc.	1st	SE Mich
MID985568021	Chemical Analytics, Inc.	2nd and 4th	SE Mich
MID098011992	CyanoKEM (Le Petomane VII Custodial Trust)	1st and 3rd	SE Mich
MID091605972	Detrex Corp.	1st, 2nd, 3rd, and 4th	SE Mich
MID074259565	Dynecol, Inc.	1st, 2nd, 3rd, and 4th	SE Mich
MIR000016055	EDS	1st, 2nd, 3rd, and 4th	SE Mich
MID980991566	EQ Detroit	1st, 2nd, 3rd, and 4th	SE Mich
MID060975844	EQ Resource Recovery, Inc.	1st, 2nd, 3rd, and 4th	SE Mich
MID980568711	Ford Company Allen Park Clay Mine	1st and 3rd	SE Mich
MID005338801	Gage Products Co.	1st and 3rd	SE Mich
MID005356910	GMNA Property Mgmt Fiero Facility	2nd	SE Mich
MID005356886	GMC Metal Fabricating Division	2nd	SE Mich
MID050615996	GMC Technical Center	1st, 2nd, 3rd, and 4th	SE Mich
MID005378161	Michigan Chrome & Chemical Co.	3rd	SE Mich
MID000724831	Michigan Disposal Waste Treatment	1st, 2nd, 3rd, and 4th	SE Mich
MID980615298	Petro-Chem Processing Group of Nortru	1st, 2nd, 3rd, and 4th	SE Mich
MID009708678	Solutia, Inc.	3rd	SE Mich
MID048090633	Wayne Disposal, Inc., Site #2	1st, 2nd, 3rd, and 4th	SE Mich
MID000810408	Woodland Meadows Landfill North	1st	SE Mich
MID004508628	Wyckoff Steel	1st	SE Mich
MID980825632	MDNR Toxaphene Pit	4th	Cadillac
MID000809632	Dow Corning Corp.	2nd	Saginaw Bay
MID000820381	Pfizer (formerly Pharmacia)	3rd	Kalamazoo
MID053343976	Michigan State University	1st, 2nd, 3rd, and 4th	Lansing
MID005356712	GMC NAO Flint Operations	2nd	Lansing

Michigan's RCRA Work Plan for Fiscal Year 2007  
Scheduled Activities  
3.2 Compliance and Enforcement

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Site ID	Site Name for TSDF	Quarter(s)	District
MID005356860	GMC Delphi Coldwater Road	4th	Lansing
MID005358130	Total Petroleum, Inc.	1st and 3rd	Lansing
MID006013643	Pfizer (Parke Davis)	4th	Gr Rapids
MID006014906	Occidental Chemical	2nd	Gr Rapids
MID006026793	Access Business Gr LLC (formerly Amway)	4th	Gr Rapids
MID000724724	Dow Chemical Co.	1st and 3rd	Saginaw Bay
MID017079625	Delphi Automotive Systems	2nd	Gr Rapids
MID080358351	Bayer CropScience	3rd	Gr Rapids
MID092947928	Drug & Laboratory Disposal	2nd and 4th	Kalamazoo
MID980617435	Dow Chemical Co. Salzburg Landfill	1st and 3rd	Saginaw Bay
MID980499735	Perfect Circle Division of Dana Corp.	1st	Gr Rapids
MID980681696	Vopak USA, Inc.	3rd	Gr Rapids
MID990687964	Lake States Wood Preserving	3rd	UP
MIR000001834	University of Michigan Beck Road	1st and 3rd	Jackson
MID005057005	Visteon Ford Monroe Stamping	1st	Jackson
MID009305665	Visteon Ford Saline	2nd	Jackson
MID990760100	DaimlerChrysler Corp.	4th	Jackson

Michigan's RCRA Work Plan for Fiscal Year 2007  
Scheduled Activities  
3.2 Compliance and Enforcement

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Activity Discussion: OCI

The OCI activities in conjunction with the RCRA Work Plan are grouped into three categories:

- 1) TSD Facilities: The OCI officers will investigate violations at TSD facilities in conjunction with the WHMD staff pursuant to a complaint or the findings of a WHMD staff inspection. In addition, the OCI may institute random patrols resulting in the inspection of waste hauling vehicles at TSD facilities and inspection of TSD records. Where warranted, the OCI will compile cases for referral to a county prosecutor or the Michigan Department of Attorney General (MDAG) for prosecution. The OCI will also perform investigations to support the WHMD civil/administrative enforcement cases as requested.
- 2) Hazardous Waste Transporters: The OCI will continue its program of inspecting waste transporters for compliance with hazardous waste transport and disposal regulations. Waste hauling vehicle inspections will occur either as random events or as scheduled efforts carried out at major points of truck concentrations (e.g., Blue Water Bridge at Port Huron and major highway truck weigh stations). Scheduled events will be conducted in conjunction with U.S. Customs/Ontario officials and/or Michigan State Police's Motor Carrier Division officers as appropriate.

To supplement the on-road vehicle inspection program, the OCI may audit waste transporter facility documents. Also, the OCI will work with the WHMD to determine whether existing data meets enforcement needs. The OCI will utilize an innovative analysis of uniform waste manifest databases, waste generation reports, TSD facility reports, manufacturing facility databases, and other factors to identify waste hauler enforcement targets.

The OCI and the WHMD will work with the U.S. Customs to analyze waste documentation and determine the feasibility of implementing an innovative "Operational Analysis Targeting System" for international waste movements at the Michigan/Ontario border.

- 3) Generators: The OCI will investigate generator/facility violations of suspected hazardous waste mismanagement or releases in conjunction with WHMD staff pursuant to a complaint or the findings of a WHMD staff inspection. Noncompliant generators may also be detected by OCI officers during transporter and TSD audits. Where warranted, the OCI will compile cases for referral to a county prosecutor or the MDAG for prosecution. The OCI will also perform investigations to support the WHMD civil/administrative enforcement cases as requested.

Michigan's RCRA Work Plan for Fiscal Year 2007  
Scheduled Activities  
3.2 Compliance and Enforcement

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**Compliance Monitoring Evaluation (CME)/Operation and Maintenance (O&M) Inspection Universe**

The WHMD, Hazardous Waste Section (HWS), CME/O&M inspection universe is presented in the following table:

**MICHIGAN LAND DISPOSAL FACILITIES  
GROUNDWATER MONITORING**

<b>FACILITY NAME</b>	<b>EPA ID NUMBER</b>	<b>FACILITY ADDRESS</b>
DaimlerChrysler Corp.	MID990760100	2880 Zeeb Rd., Ann Arbor
Dow Chemical Salzburg Landfill	MID980617435	Salzburg & Waldo Rds., Midland
Dow Chemical Co. Main Plant	MID000724724	D & 14th, Midland
Dow Corning Corp.	MID000809632	3901 S. Saginaw Rd., Midland
Visteon Ford Monroe Stamping	MID005057005	5200 E. Elm Ave., Monroe
GMC Delphi Coldwater Road	MID005356860	1245 E. Coldwater Rd., Flint
Grand Blanc Landfill	MID980506265	2277 W. Grand Blanc Rd., Rankin
Granger Land Development Co.	MID082771700	8500 W. Grand River, Lansing
Grede-Vassar	MID005513262	700 E. Huron Ave., Vassar
Kurziel Iron	MID006025217	2625 Winston, Rothbury
Lacks Industries, Inc.	MID006014666	1601 Galbraith, S.E. Cascade, Grand Rapids
Lacks Industries, Inc.	MID080359433	6130 Riverside Dr., Saranac
Lake States Wood Preserving	MID990687964	Highway M-28 E., Munising
MDNR Roscommon	MID980825632	1515 E. Robinson Rd., Roscommon
Occidental Chemical	MID006014906	Old Channel Trl. & Whitebeck Rd., Montague
PermaFix, Inc. (Chem Met)	MID096963194	18550 Allen Rd., Wyandotte
Solutia, Inc.	MID009708678	5045 West Jefferson (Monsanto Co.), Trenton
Total Petroleum, Inc.	MID005358130	East Superior St., Alma
Wayne Disposal, Inc., Site #2	MID048090633	49350 N. Service, Site #2, Belleville
Woodland Meadows Landfill North	MID000810408	4620 Hannan Rd., Wayne
Wyckoff Steel	MID004508628	1000 General Dr., Plymouth

Count: 21

\* The CME/O&M Universe List will be revised, as necessary, at the end of each quarter during FY07.

Michigan's RCRA Work Plan for Fiscal Year 2007  
Scheduled Activities  
3.2 Compliance and Enforcement

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**CME/O&M Previous Inspections**

The CME/O&M inspections that have been done in the past are shown in the following table:

<b>MDEQ Previous CME/O&amp;M Inspections</b>				
<b>FY02</b>	<b>FY03</b>	<b>FY04</b>	<b>FY05</b>	<b>FY06</b>
Dow Chemical Co. (Main Plant)	DaimlerChrysler Corp.	Wycoff Steel	Kurdzziel Iron	DaimlerChrysler Corp.
GMC Delphi Coldwater Road	Dow Corning Corp.	Lacks Industries, Inc.	Occidental Chemical	Dow Chemical Co. Main Plant
Kurdzziel Iron	Grede-Vassar	Woodland Meadows Landfill North	Solutia, Inc.	Granger Land Development Co.
Lacks Industries, Inc., Saranac	Granger Land Development Co.	Visteon Ford Monroe Stamping	GMC Delphi Coldwater Road	Dow Corning Corp.
Occidental Chemical	PermaFix, Inc. (Chem Met)	Grand Blanc Landfill	Dow Chemical Salzburg Landfill	Lacks Industries, Inc. Saranac
PermaFix, Inc. (Chem Met)	Total Petroleum, Inc. Landfarm	MDNR Roscommon	Lake States Wood Preserving	PermaFix, Inc. (Chem Met)
Solutia, Inc.	Total Petroleum, Inc. WWTP	PermaFix, Inc. (Chem Met)	PermaFix, Inc. (Chem Met)	Wayne Disposal, Inc.
Wayne Disposal, Inc.	Wayne Disposal, Inc.	Wayne Disposal, Inc.	Wayne Disposal, Inc.	

**CME/O&M Schedule**

HWS staff will conduct the CME/O&M inspections during FY07 as shown in the following schedule.

The TSD Work Schedule for FY07, Compliance and Enforcement Program, follows this page.

## TSD Work Schedule for FY 2007

Hazardous Waste Section

### COMPLIANCE AND ENFORCEMENT PROGRAM

<u>Current Facility Name</u>	<u>Facility Identification Number</u>	<u>Staff</u>
<b>ALMA FACILITY</b>	<b>MID 005 358 130</b>	<b>DM</b>
<b>1 <u>CONDUCT COMPREHENSIVE MONITORING EVALUATION INSPECTION IN Q2</u></b> <i>Our commitment is to conduct a comprehensive monitoring and evaluation inspection in quarter 2.</i>		
<b>2 <u>CONDUCT POST CLOSURE CAP INSPECTION IN Q3</u></b> <i>Our commitment is to conduct a post closure cap inspection in quarter 3.</i>		
<b>AUTOMOTIVE COMPONENTS HOLDINGS</b>	<b>MID 005 057 005</b>	<b>DM</b>
<b>3 <u>CONDUCT COMPREHENSIVE MONITORING EVALUATION INSPECTION IN Q3</u></b> <i>Our commitment is to conduct a comprehensive monitoring and evaluation inspection in quarter 3.</i>		
<b>DOW CHEMICAL MAIN PLANT &amp; INCINER</b>	<b>MID 000 724 724</b>	<b>DM</b>
<b>4 <u>CONDUCT POST CLOSURE CAP INSPECTION IN Q1</u></b> <i>Our commitment is to conduct a post closure cap inspection of the northwest plant sites in quarter 1.</i>		
<b>5 <u>CONDUCT POST CLOSURE CAP INSPECTION IN Q4</u></b> <i>Our commitment is to conduct a post closure cap inspection of the southeast plant sites in quarter 1.</i>		
<b>FORMER WYCOFF STEEL INC</b>	<b>MID 004 508 628</b>	<b>DM</b>
<b>6 <u>CONDUCT COMPREHENSIVE MONITORING EVALUATION INSPECTION IN Q1</u></b> <i>Our commitment is to conduct a comprehensive monitoring and evaluation inspection in quarter 1.</i>		



## COMPLIANCE AND ENFORCEMENT PROGRAM

<u>Current Facility Name</u>	<u>Facility Identification Number</u>	<u>Staff</u>
<b>GRAND BLANC LANDFILL</b>	<b>MID 980 506 265</b>	<b>DM</b>
<p>7 <u>CONDUCT COMPREHENSIVE MONITORING EVALUATION INSPECTION IN Q2</u></p> <p><i>Our commitment is to conduct a comprehensive monitoring and evaluation inspection in quarter 2.</i></p>		
<p>8 <u>CONDUCT POST CLOSURE CAP INSPECTION IN Q1</u></p> <p><i>Our commitment is to conduct a post closure cap inspection in quarter 1.</i></p>		
<b>LACKS INDUSTRIES INC</b>	<b>MID 006 014 666</b>	<b>DM</b>
<p>9 <u>CONDUCT COMPREHENSIVE MONITORING EVALUATION INSPECTION IN Q4</u></p> <p><i>Our commitment is to conduct a comprehensive monitoring and evaluation inspection in quarter 4.</i></p>		
<b>MI DEPT/ENVIRON QTY STORAGE FACIL</b>	<b>MID 980 825 632</b>	<b>DM</b>
<p>10 <u>CONDUCT COMPREHENSIVE MONITORING EVALUATION INSPECTION IN Q4</u></p> <p><i>Our commitment is to conduct a comprehensive monitoring and evaluation inspection in quarter 4.</i></p>		
<b>OCCIDENTAL CHEMICAL CORP</b>	<b>MID 006 014 906</b>	<b>DM</b>
<p>11 <u>CONDUCT POST CLOSURE CAP INSPECTION IN Q4</u></p> <p><i>Our commitment is to conduct a post closure cap inspection in quarter 4.</i></p>		
<b>THE DOW CHEMICAL COMPANY-SALZB</b>	<b>MID 980 617 435</b>	<b>DM</b>
<p>12 <u>CONDUCT POST CLOSURE CAP INSPECTION IN Q2</u></p> <p><i>Our commitment is to conduct a post closure cap inspection in quarter 2.</i></p>		
<b>WAYNE DISPOSAL INC</b>	<b>MID 048 090 633</b>	<b>DM</b>
<p>13 <u>CONDUCT COMPREHENSIVE MONITORING EVALUATION INSPECTION IN Q4</u></p> <p><i>Our commitment is to conduct a comprehensive monitoring and evaluation inspection in quarter 4.</i></p>		

## COMPLIANCE AND ENFORCEMENT PROGRAM

<u>Current Facility Name</u>	<u>Facility Identification Number</u>	<u>Staff</u>
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WOODLAND MEADOWS LDFL NORTH	MID 000 810 408	DM
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14 CONDUCT COMPREHENSIVE  
MONITORING EVALUATION  
INSPECTION IN Q2

*Our commitment is to conduct a comprehensive monitoring and evaluation inspection in quarter 2.*

15 CONDUCT POST CLOSURE CAP  
INSPECTION IN Q3

*Our commitment is to conduct a post closure cap inspection in quarter 3.*

Michigan's RCRA Work Plan for Fiscal Year 2007  
Scheduled Activities  
3.3 Permitting and Closure

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### **3.3 PERMITTING AND CLOSURE**

#### Objective

The objective of the Permitting and Closure Program is to implement the strategy described in Section 2 to issue operating licenses and postclosure operating licenses, approve closure plans and postclosure plans, and apply other administrative mechanisms via the multiyear schedule presented in Section 2, such that the U.S. EPA GPRA "approved controls in place" goals by FY08 will be achieved.

#### Considerations

The MDEQ will apply resources as well as allocate the work to be done between the U.S. EPA, Region 5, and other MDEQ divisions to achieve the multiyear "controls in place" schedules presented in Section 2. Successfully implementing these schedules will allow the MDEQ to meet the FY08 national goals for the "approved controls in place" GPRA baseline of facilities.

#### Scheduled Activities: HWS

Consistent with the U.S. EPA's GPRA "approved controls in place" baseline of facilities, for which the MDEQ is the lead regulatory agency as grouped by calendar year in Table 2.3.2, following this page is a description of the "controls in place" work that HWS staff commits to for TSD facilities in FY07. The HWS commitments are described here, alphabetically by facility.

The TSD Work Schedule for FY07, Permits Program, follows this page.

## TSD Work Schedule for FY 2007

Hazardous Waste Section

### PERMITS PROGRAM

<u>Current Facility Name</u>	<u>Facility Identification Number</u>	<u>Staff</u>
<b>AUTOMOTIVE COMPONENTS HOLDINGS</b>	<b>MID 005 057 005</b>	<b>PQ</b>
<b>1 <u>GPRA POST CLOSURE OPERATING LICENSE ISSUED</u></b> <i>Our commitment is to conduct public participation and issue the post-closure operating license.</i>		
<b>ENVIRONMENTAL DISPOSAL SYSTEMS</b>	<b>MIR 000 016 055</b>	<b>RB</b>
<b>2 <u>ENFORCEMENT TECHNICAL SUPPORT</u></b> <i>Our commitment is to continue to provide technical support relative to the ongoing litigation between Sunoco, EDS, Wayne County, the City of Romulus, the City of Taylor, and the DEQ.</i>		
<b>GRAND BLANC LANDFILL</b>	<b>MID 980 506 265</b>	<b>KT</b>
<b>3 <u>GPRA POST CLOSURE OPERATING LICENSE ISSUED</u></b> <i>Our commitment is to issue a post-closure operating license with corrective action provisions.</i>		
<b>LIMITED STORAGE FACILITY</b>	<b>MIK 644 147 266</b>	<b>DD</b>
<b>4 <u>PUBLIC NOTICE DRAFT OPERATING LICENSE</u></b> <i>Our commitments are to conduct a Technical Review of a limited storage facility operating license application, and to public notice a draft decision on the application. The citizens have voiced environmental justice and health concerns with the construction of the new facility. The facility will be storing and consolidating lab and other hazardous waste materials from university functions.</i>		
<b>MICHIGAN DISPOSAL WASTE TREATME</b>	<b>MID 000 724 831</b>	<b>KT</b>
<b>5 <u>OPERATING LICENSE ISSUANCE</u></b> <i>Our commitment is to reissue the Part 111 Operating Licenses.</i>		
<b>WAYNE DISPOSAL INC</b>	<b>MID 048 090 633</b>	<b>PQ</b>
<b>6 <u>OPERATING LIC APPLICATION TECHNICAL REVIEW</u></b> <i>Our commitment is to conduct completeness and technical review of the Part 111 Operating License renewal application.</i>		

### **3.4 CORRECTIVE ACTION**

#### Objective

The objective of the Corrective Action Program is to implement the strategy described in Section 2 to conduct corrective action at the U.S. EPA's GPRA "corrective action" baseline of facilities for which the MDEQ is the lead regulatory agency via the multiyear schedule presented in Section 2, such that the MDEQ will achieve the four U.S. EPA GPRA "corrective action" goals by FY08.

#### Considerations

The MDEQ will apply resources as well as allocate the work to be done between the U.S. EPA, Region 5, and other MDEQ divisions to achieve the multiyear "corrective action" schedules presented in Section 2. Successfully implementing these schedules will allow the MDEQ to meet the FY08 national goals for the "corrective action" GPRA baseline of facilities.

#### Scheduled Activities: HWS

Consistent with the following four schedules of Section 2, following this page is a description of the corrective action work that HWS staff commits to for TSD facilities in FY07. The commitments are described here, alphabetically by facility.

- 1) Table 2.4.2 GPRA Human Exposures Controlled (CA725): By Calendar Year: FY06-FY08 Baseline,
- 2) Table 2.4.3 GPRA Release to Groundwater Controlled (CA750): By Calendar Year: FY06-FY08 Baseline,
- 3) Table 2.4.4 GPRA Remedy Selected (CA400): By Calendar Year: FY06-FY08 Baseline, and
- 4) Table 2.4.5 GPRA Complete Construction (CA550): By Fiscal Year: FY06-FY08 Baseline,

The TSD Work Schedule for FY07, Corrective Action Program, follows this page.

## TSD Work Schedule for FY 2007

Hazardous Waste Section

### CORRECTIVE ACTION PROGRAM

<u>Current Facility Name</u>	<u>Facility Identification Number</u>	<u>Staff</u>
<b>ACCESS BUSINESS GROUP LLC</b>	<b>MID 006 026 793</b>	<b>PQ</b>
<b>1 <u>CORRECTIVE ACTION OVERSIGHT</u></b>		
<i>Our commitment is to review and approve phased CMS/CMI workplans, interim measures, and perform fieldwork during implementation of the approved CMS/CMI workplans or interim measures. The GPRA EI indicators for human exposure and groundwater controlled were completed in FY 2004.</i>		
<b>ADVANCED RESOURCE RECOVERY LLC</b>	<b>MID 057 002 602</b>	<b>JR</b>
<b>2 <u>CORRECTIVE ACTION OVERSIGHT</u></b>		
<i>Our commitment is to conduct Corrective Action Oversight for site-wide Corrective Action to insure the facility meets the schedule and deadlines specified in Closure and Corrective Action Consent Order No. 111-06-98-056.</i>		
<b>ALMA FACILITY</b>	<b>MID 005 358 130</b>	<b>PQ</b>
<b>3 <u>CORRECTIVE ACTION OVERSIGHT</u></b>		
<i>Our commitment is to review and approve phased RFI workplans, interim measures submitted pursuant to the CA order and perform fieldwork during implementation of the approved RFI workplans or interim measures. The GPRA EI indicators human exposures controlled and groundwater controlled have been completed. Our commitment is to review and approve phased RFI workplans, interim measures and perform fieldwork during implementation of the approved RFI workplans or interim measures.</i>		
<b>BAYER CROPSCIENCE LP</b>	<b>MID 080 358 351</b>	<b>RC</b>
<b>4 <u>GPRA REMEDY SELECTED [CA400]</u></b>		
<i>This is a carry over commitment from FY06 that may still be met in FY06. Our commitment is to meet the GPRA Remedy Selected (CA400) requirement to have the cleanup remedy selected by 9/30/07</i>		
<b>CYTEC INDUSTRIES INC</b>	<b>MID 005 360 680</b>	<b>DD</b>
<b>5 <u>CORRECTIVE ACTION OVERSIGHT</u></b>		
<i>Our commitment is to continue corrective action oversight. The facility is expected to have a remedy in place for soil and groundwater contamination in FY'06. WHMD expects to review operations and maintenance plans for ongoing maintenance of remedy controls, in advance of the FY08 commitment.</i>		

## CORRECTIVE ACTION PROGRAM

<u>Current Facility Name</u>	<u>Facility Identification Number</u>	<u>Staff</u>
DAIMLER CHRYSLER CORP INTROL DIV	MID 990 760 100	JR
<p>6 <u>GPRA GROUNDWATER CONTROLLED [CA750]</u></p> <p><i>The facility is conducting site-wide corrective action under its approved September 2003 Post-Closure Plan. Our commitment is to meet the GPRA Release to Groundwater Controlled (CA750) by September 2007. Our previous commitment of meeting GPRA Remedy Selected (CA400) has been moved to FY08 in accordance with the current project schedule.</i></p>		
DELPHI FLINT EAST - DORT HWY	MID 005 356 647	RC
<p>7 <u>CORRECTIVE ACTION TECHNICAL SUPPORT</u></p> <p><i>Our commitment is to support corrective action oversight for the voluntary corrective action being led by Region 5. The facility has a container storage area undergoing corrective action.</i></p>		
DETREX CORPORATION SITE A	MID 091 605 972	DD
<p>8 <u>CORRECTIVE ACTION OVERSIGHT</u></p> <p><i>Our Commitment is to continue Corrective Action Oversight. The WHMD expects to review corrective measures proposals for a final remedy at the facility. The facility has proposed some site specific cleanup numbers for the Part 201 criteria that will require Toxicological review. However, groundwater is not in an aquifer at the facility and all properties adjacent to the facility are industrial use. Detrex is proposing institutional and engineering controls, including excavation as a final remedy for cleanup.</i></p>		
DOW CHEMICAL MAIN PLANT & INCINER	MID 000 724 724	CH
<p>9 <u>CORRECTIVE ACTION OVERSIGHT</u></p> <p><i>Our commitment is to conduct on-site and off-site corrective action oversight for this facility during FY07.</i></p>		
DSC LTD TRENTON PLANT-SITE A	MID 017 422 304	RC
<p>10 <u>CORRECTIVE ACTION OVERSIGHT</u></p> <p><i>Our Commitment is to conduct corrective action oversight for facility wide corrective action under a comprehensive corrective action remedial consent order entered on December 17, 1999.</i></p>		
E I DU PONT DE NEMOURS-MONTAGUE	MID 000 809 640	RB
<p>11 <u>CORRECTIVE ACTION OVERSIGHT</u></p> <p><i>Our commitment is to take a more active role in conducting oversight for corrective action, which has been largely done on a voluntary basis to date, at this large facility. The primary emphasis will be the review and approval of a groundwater remediation system, potentially including a mixing zone determination, and oversight of its construction and installation. Pending implementation of the groundwater remediation approach, it may be feasible to complete the Groundwater Controlled Environmental Indicator.</i></p>		

## CORRECTIVE ACTION PROGRAM

<u>Current Facility Name</u>	<u>Facility Identification Number</u>	<u>Staff</u>
<b>EI DUPONT DE NEMOURS</b>	<b>MID 005 512 066</b>	<b>DD</b>
12 <u>GPRA REMEDY SELECTED [CA400]</u>  <i>Out commitment is to have a corrective action remedy imposed. RFI activities are nearly complete as of Q3'06. In addition, the facility has proposed a final remedial action plan for the property. This remedial action plan will go before the Remediation Advisory Team for a final review and then the RAP will be approved, approved with modifications, etc.</i>		
<b>EQ RESOURCE RECOVERY INC</b>	<b>MID 060 975 844</b>	<b>PQ</b>
13 <u>CORRECTIVE ACTION OVERSIGHT</u>  <i>Our commitment is to review and approve any CMS/CMI work determined to be necessary pursuant to the operating license and perform fieldwork as necessary. The GPRA EI indicators human exposures controlled and groundwater controlled were completed in 1999.</i>		
<b>FORD MOTOR CO ALLEN PK CLAY MINE</b>	<b>MID 980 568 711</b>	<b>PQ</b>
14 <u>GPRA GROUNDWATER CONTROLLED [CA750]</u>  <i>Our Commitment is to make a Human Exposures Controlled Determination (CA725).</i>		
<b>GENERAL DYNAMICS LAND SYSTEMS DI</b>	<b>MID 006 407 597</b>	<b>DD</b>
15 <u>CORRECTIVE ACTION OVERSIGHT</u>  <i>Our commitment is to continue corrective action oversight. We expect to review a groundwater/surface water interface monitoring plan and plans to remedy product in the lower part of the aquifer. In addition, institutional controls are expected to be put in place.</i>		
<b>KURDZIEL IRON OF ROTHBURY INC</b>	<b>MID 006 025 217</b>	<b>PQ</b>
16 <u>CORRECTIVE ACTION OVERSIGHT</u>  <i>Our commitment is to review and approve any RFI work determined to be necessary pursuant to the expanded post closure plan and perform fieldwork as necessary.</i>		
<b>LACKS INDUSTRIES INC</b>	<b>MID 006 014 666</b>	<b>CH</b>
17 <u>GPRA GROUNDWATER CONTROLLED [CA750]</u>  <i>Our commitment is to meet the GPRA EI 750 requirement to have off-site groundwater migration controlled by September 30, 2007. This is a carryover commitment because this commitment could not be achieved during FY06.</i>		



## CORRECTIVE ACTION PROGRAM

<u>Current Facility Name</u>	<u>Facility Identification Number</u>	<u>Staff</u>
MICHIGAN SEAMLESS TUBE	MID 082 767 591	RB
18 <u>CORRECTIVE ACTION OVERSIGHT</u>		
<i>Our commitment is to continue to conduct oversight for facility-wide corrective action under the April 7, 2004, Corrective Action Consent Order. The focus of the oversight will be the completion of the assessment and investigation portions of the corrective action process.</i>		
NATIONAL STANDARD NILES CITY COM	MID 005 069 257	KT
19 <u>CORRECTIVE ACTION OVERSIGHT</u>		
<i>Our commitment is corrective action oversight. The WHMD will continue to review the corrective action documents submitted pursuant to the WHMD's November 1995 Corrective Action Consent Order.</i>		
PEPIN IRECO INC	MID 041 413 154	RC
20 <u>CORRECTIVE ACTION OVERSIGHT</u>		
<i>Our commitment is to conduct corrective action oversight. Pepin Ireco continues to perform corrective action activities for the Burning Grounds and Bone Yard areas of concern. The WHMD reviewed and provided substantial comments on a "Closure Certification Report", which is actually a Corrective Action Certification Report, submitted by Pepin Ireco. The comments included requiring further investigation activities for corrective action.</i>		
PERMA FIX OF MICHIGAN INC	MID 096 963 194	KT
21 <u>CORRECTIVE ACTION OVERSIGHT</u>		
<i>Our commitment is corrective action oversight. The WHMD is proposing to have this GPRA facility included in the list of facilities scheduled to have "remedy selected" by September 30, 2008. Perma-Fix's final closure was accepted on January 13, 2006. A draft corrective action consent order (CACO) specifying the remaining corrective action obligations for the facility will be sent to Perma-Fix in May 2006. This CACO shall serve as the GPRA "Controls in Place" after the consent judgment, which incorporates the operating license, is terminated.</i>		
PFIZER GLOBAL MANUFACTURING HOL	MID 006 013 643	CH
22 <u>CORRECTIVE ACTION OVERSIGHT</u>		
<i>Our commitment is to conduct corrective action oversight for this facility during FY07 and work toward remedy selection during FY08.</i>		
REALM/COLDWATER ROAD LANDFILL	MID 005 356 860	RC
23 <u>CORRECTIVE ACTION OVERSIGHT</u>		
<i>Our commitment is Postclosure Plan oversight. Work will include the review and approval of work plans and reports submitted in accordance with the schedule in the postclosure plan and corrective action consent order.</i>		

## CORRECTIVE ACTION PROGRAM

<u>Current Facility Name</u>	<u>Facility Identification Number</u>	<u>Staff</u>
REICHHOLD INC FERNDALE MICHIGAN	MID 020 087 128	DD
24 <u>CORRECTIVE ACTION OVERSIGHT</u>		
<i>Out commitment is to conduct corrective action oversight for the final remedy under a new CACO. The facility has completed corrective actions voluntarily. However, the process must be formalized under the new consent order to tie things up.</i>		
REMEDATION & REDEVELOPMENT DIV	MID 072 589 328	KT
25 <u>GPRA HUMAN EXPOSURES CONTROLLED [CA725]</u>		
<i>Our Commitment is to make a Human Exposures Controlled Determination (CA725) determination.</i>		
RUGGED LINER INC	MID 058 816 927	RC
26 <u>GPRA REMEDY SELECTED [CA400]</u>		
<i>Our commitment is to complete a remedy selected determination.</i>		
SELFRIDGE AIR NATIONAL GUARD	MID 099 113 128	PQ
27 <u>CORRECTIVE ACTION OVERSIGHT</u>		
<i>Our commitment is to review and approve phased RFI workplans , interim measures, CMS workplans, and perform fieldwork during implementation of the approved RFI &amp; CMS workplans or interim measures. The GPRA EI indicators human exposures controlled was completed in 2004 and groundwater controlled was / due to be completed in 2005. Pete to confirm this statement.</i>		
SEVERSTAL NORTH AMERICA INC	MID 087 738 431	KT
28 <u>CORRECTIVE ACTION OVERSIGHT</u>		
<i>Our commitment is corrective action oversight. The WHMD will continue to review corrective action documents submitted pursuant to the WHMD's April 2000 Corrective Action Consent Order for the Rouge Manufacturing Complex. This GPRA facility achieved "human exposures controlled" and "groundwater controlled" in FY05.</i>		
TRANSIGN INC	MID 006 007 967	DD
29 <u>CORRECTIVE ACTION OVERSIGHT</u>		
<i>Our Commitment is to enter a consent order or other order to administer corrective action at the facility. The facility is at the beginning of corrective actions. The initial environmental assessment showed little contamination in soils. A legally enforceable mechanism will be needed to help with oversight of the cleanup.</i>		

## CORRECTIVE ACTION PROGRAM

<u>Current Facility Name</u>	<u>Facility Identification Number</u>	<u>Staff</u>
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TRICIL ENVIRONMENTAL SERVICES	MID 072 585 755	KT
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30 CORRECTIVE ACTION OVERSIGHT

*Our commitment is corrective action oversight as the lead regulatory agency for this National Brownfields Pilot Project. The WHMD will continue to review corrective action documents when submitted and participate in monthly conference calls regarding the facility.*

WACKER CHEMICAL CORP	MID 075 400 671	DD
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31 GPRA GROUNDWATER  
CONTROLLED [CA750]

*Our Commitment is to make a Groundwater Releases Controlled Determination (CA750). Wacker Chemical Corp. is under a consent order with the DEQ to accomplish environmental indicators by September 30, 2007. The facility has implemented interim measures, including a permeable reactive barrier at the river, permanganate injection upgradient, and source reduction via soil vapor extraction and air sparging. The facility has also received a mixing zone determination where contamination has entered the river, and has defined the plume of groundwater contamination at the facility. We are only waiting for results from the various interim measures to make the EI determinations.*

32 GPRA HUMAN EXPOSURES  
CONTROLLED [CA725]

*Our Commitment is to make a Human Exposures Controlled Determination (CA725) and a Groundwater Releases Controlled Determination (CA750). Wacker Chemical Corp. is under a consent order with the DEQ to accomplish environmental indicators by September 30, 2007. The facility has implemented interim measures, including a permeable reactive barrier at the river, permanganate injection upgradient, and source reduction via soil vapor extraction and air sparging. The facility has also received a mixing zone determination where contamination has entered the river, and has defined the plume of groundwater contamination at the facility. We are only waiting for results from the various interim measures to make the EI determinations.*

Michigan's RCRA Work Plan for Fiscal Year 2007  
Scheduled Activities  
3.5 State Authorization

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### 3.5 STATE AUTHORIZATION

#### Objective

Obtain and maintain adequate legal authorities to conduct regulatory activities required by RCRA.

#### Considerations

- 1) Status of authorization activities indicated in the Work Plan.
- 2) Effectiveness of communication with the U.S. EPA concerning authorization activities, including timeliness and sufficiency of responses to the U.S. EPA's comments.

#### Scheduled Activities

- 1) Federal Program Revisions

The MDEQ will continue to obtain and maintain the legal authorities necessary to administer a quality state program and conduct the regulatory activities required pursuant to RCRA.

State efforts will focus on the initiation of an administrative rules package that addresses, in part, the balance of RCRA Cluster 14, all of RCRA Cluster 15 and RCRA Cluster 16, and portions of RCRA Cluster 17. The package may also contain state-initiated revisions to improve the overall quality of the rules.

- 2) Authorization Activities Schedule

Event	Date
Submit draft rules to the U.S. EPA	October 30, 2006

- 3) Review Responsibilities

Different review and response time frames exist for the various authorization activities as outlined below:

Michigan's RCRA Work Plan for Fiscal Year 2007  
Scheduled Activities  
3.5 State Authorization

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Event	Party	Time Frame
Provide the state with written comments on draft rules and associated checklists	U.S. EPA	Within 60 days of receipt of draft rules and checklists
Provide the U.S. EPA with a written response to comments on draft rules and checklists, and copies of revised documents as needed	MDEQ	Within 60 days of receipt of comments
Provide the U.S. EPA with copy of public notice announcing public hearing on draft rules	MDEQ	No later than time notice is provided to public
Provide the U.S. EPA with a copy of the effective rules	MDEQ	Within 30 days of effective date of rules
Provide the U.S. EPA with a draft authorization revision application (ARA)	MDEQ	Within 30 days of effective date of rules
Provide the state with written comments on the draft ARA	U.S. EPA	Within 60 days of receipt of draft ARA
Provide the U.S. EPA with written response to comments on draft ARA and submit final ARA	MDEQ	Within 60 days of receipt of comments
Provide the state with written comments on final ARA	U.S. EPA	Within 60 days of receipt of final ARA
Provide the U.S. EPA with a written response to comments on final ARA	MDEQ	Within 60 days of receipt of comments

#### 4) Authorization Activities Schedule Adjustment

If a grant commitment will not be met, the MDEQ will take the following actions prior to that commitment date, except as noted otherwise:

- For delays of 30 days or less, provide verbal notification to the U.S. EPA Regulatory Specialist.
- For delays of more than 30 days, submit a letter to the U.S. EPA Regulatory Specialist that explains the reasons for the delay and includes a revised authorization activities schedule, as appropriate.

If the U.S. EPA requires time beyond the time frames outlined in the above review responsibilities to review submittals and the resulting delay impacts future grant commitments, the U.S. EPA will take the following actions:

- For delays that will impact commitments by 30 days or less, provide verbal notification to the MDEQ.
- For delays that will impact commitments by more than 30 days, submit a letter to the MDEQ that explains the reasons for the delay and includes a revised authorization activities schedule.

Michigan's RCRA Work Plan for Fiscal Year 2007  
Scheduled Activities  
3.5 State Authorization

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In such cases, the MDEQ will not be required to submit formal authorization activities schedule extension requests.

5) Report on Authorized State Program Revisions (RASPR)

The MDEQ will submit a RASPR by January 15, 2007. The RASPR will include: the Federal Register (FR) title, date, and citation; the federal statutory basis for the revision; the associated RCRA cluster number; the associated RCRA revision checklist number; the date by which program revisions are required; the date appearing on the rules package; the effective date of the rules; the amendment number associated with the rules package in relation to the base program; the authorization FR citation and date; the date of authorization; a comments field; the codification FR citation and date; and the codification date.

### 3.6 WASTE MINIMIZATION

#### Objective

Meet the goals and priorities described in Section 2 with the available resources.

#### Considerations

The MDEQ conducts waste minimization activities primarily through the ESSD. The ESSD's activities are not considered part of the RCRA Work Plan, but are generally consistent with the U.S. EPA guidance. The WHMD field inspectors do provide waste minimization assistance and information to different categories of hazardous waste generators.

The Regulatory Integration Strategy adopted in FY98 has been implemented and is an ongoing priority of ESSD staff. Regulatory integration will continue to be the focus in FY07 at the district office level. In addition to this pollution prevention (P2) effort by ESSD field staff, there are several new and ongoing programs initiated by ESSD technical and program staff that include assistance in waste minimization.

#### Scheduled Activities: ESSD

Areas of concentration for the upcoming year include:

- Regulatory integration efforts with the WHMD will continue to be a priority with ESSD field staff. The ESSD field staff will work with the WHMD to promote P2 in their compliance assistance efforts, including accompanying the WHMD staff on compliance inspections to promote waste minimization to businesses, industry, and manufacturing facilities.
- A **P2 Integration Award Program** was instituted within the MDEQ in FY98 and will continue into FY07.
- The **ESSD, Compliance Assistance Unit**, provides regulatory compliance assistance and encourages waste minimization by providing one-on-one assistance, workshops, and developing regulatory/P2 guidance documents.
- The **Michigan Household Hazardous Waste Collection Initiative**, funded through the Clean Michigan Initiative, has now funded eleven projects to address residential hazardous waste disposal in Michigan communities. All eleven grant recipients have completed their initial two-year grant cycle and have provided final summary reports outlining their programs. This grant program had significant measurable waste reductions over the course of its grant cycle. These eleven projects, per grant agreement, will continue to conduct collection events and report their successes for a period of no less than five years from the ending date of the grant.

Michigan's RCRA Work Plan for Fiscal Year 2007  
Scheduled Activities  
3.6 Waste Minimization

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- The goal of the **Community P2 Grant Program** is to foster community partnerships and sustainability by bringing local government, businesses, planning agencies, and residents together to create change through pollution prevention. The program is funded by appropriations from unclaimed beverage container deposits. The most recent round of Community P2 Grants was announced in March 2006. This round reserved a total of \$191,000 for funding nine School Chemical Cleanout Programs in Michigan. These programs should be fully implemented in FY07.
- The **Michigan Business Pollution Prevention Partnership (MBP3)** continues to expand its offerings to innovative and diverse companies throughout Michigan. During the coming year, 90 percent of partners will establish and record source reduction activities as part of their commitment to P2 efforts at their facilities. Additionally, members will commit to the following areas of focus: material substitutions, energy conservation, water conservation, reuse efforts, and recycling efforts. The MBP3 has enjoyed steady growth in the past and is committed to a 10 to 15 percent increase in membership annually. Current membership is at 315. The primary focus has always been on the transfer and sharing of information and technology. Utilizing workshops and electronic media, members continue to share ideas on P2-oriented environmental management, sustainability, recycling, and resource management. In this regard, the MBP3 will continue to facilitate information and material exchanges via e-mail on a biweekly basis. In addition, the partnership plans to offer a minimum of two MBP3 workshop/networking opportunities during FY07. These workshops continue to be a valuable resource for the transfer of technology, program ownership, partner-to-partner networking, and opportunities for partners to offer input regarding the future of the MBP3. Partners continue to seek out new source reduction and waste minimization opportunities, which result in decreased liabilities and increased cost savings. The partnership has been focusing on several specific areas including: recycling companies, alternative energy and fuel developers, manufacturing suppliers, municipalities, and small businesses. The MBP3 continues to have a strong working relationship with Michigan's automotive industry.
- The **Automotive P2** project will continue to promote the concepts of P2 through the Original Equipment Suppliers Association (OESA) by integrating with an established P2 partnership (i.e., MBP3), while soliciting increased participation through the auto parts suppliers. Automotive facilities are encouraged to participate within the MBP3. The partnership has been working with the OESA to promote and recruit additional partners within the program.
- The goal of the **Clean Corporate Citizen (C3) Program** is to provide positive public recognition and regulatory flexibility to those establishments that have demonstrated strong environmental performance in the areas of Environmental Management Systems (EMS) and P2 while maintaining a good compliance



Michigan's RCRA Work Plan for Fiscal Year 2007  
Scheduled Activities  
3.6 Waste Minimization

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record. In FY07 the MDEQ will be recognizing four C3s with longevity awards at our annual C3 Mini Workshop. These C3s have been with the program for at least five years and have demonstrated that the process of continually seeking improvement through chemical substitution, waste reduction, energy efficiency, expanded recycling, and other proactive P2 measures is a dynamic component of an EMS and the C3 Program. ESSD staff hopes to have the revisions to the current C3 Program rules finalized and in effect in early FY07. The rules revisions will add clarity and strengthen the criteria necessary to receive and retain C3 designation. The ESSD will also be looking to add new proactive establishments in FY07 to the 124 current C3 designees.

- The **Michigan Clean Marinas Program** currently has four certified marinas with nearly 100 marinas working toward certification. Additional training workshops are planned for late 2006 or early 2007. Several items will be completed during FY07, including the formation of a Michigan Clean Marina Foundation, additional information sharing opportunities via e-mail and the Internet, and increased partnering efforts with boating/marina support industries. The goal is to have a minimum of 50 certified facilities by the end of the 2007 boating season with an additional 100 marinas pledging their commitments.
- The **Retired Engineer Technical Assistance Program (RETAP)** is committed to conducting 125 on-site P2 assessments in FY07, an accomplishment that has been achieved five consecutive years in a row. The RETAP will continue to expand on its P2 services by performing 250 hours of technical assistance for such tasks as detailed cost analyses, process mapping, and further analysis on the feasibility of assessment recommendations in preparation for their implementation. The RETAP will continue active participation in the MDEQ waste minimization and P2 initiatives, and RETAP assessors will continue to receive training on report writing, waste data collection, and P2 cost analysis. The RETAP will collect implementation information from each company at 12-month and 24-month post-receipt of their assessment report. In FY07 the amount of outcome and implementation data collected from assessed companies will be available for in-depth analysis with establishment of a fully functional, e-reporting database.
- In FY07 the **RETAP Technology Demonstration Program** will provide up to \$150,000 in matching grants to Michigan institutions of higher education to research and develop innovative P2 technologies having the potential to reduce the quantity or toxicity of specific environmental wastes currently generated by Michigan businesses. Preference is given to projects that implement and document the first commercialization, adoption, or full-scale demonstration of a P2 technology at a small- to mid-sized Michigan manufacturing business. Each implementation is intended to achieve greater adoption of the technology or practice among Michigan's business community through documentation and on-site inspection of the project's environmental and financial benefits.

Michigan's RCRA Work Plan for Fiscal Year 2007  
Scheduled Activities  
3.6 Waste Minimization

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Participants must provide a match equal to or greater than the awarded amount. To date, eleven projects have been partially funded under the program. The showcase demonstrations for FY06 projects will be completed near the end of FY07. All projects are periodically monitored for ongoing P2, waste minimization, energy efficiency, and financial benefits. The program will continue to develop and make available documentation on the environmental benefits of these demonstrated technologies.

- The **Michigan Turfgrass Environmental Stewardship Program (MTESP)** currently has 234 golf courses voluntarily participating in the program and has certified 63 with nearly 200 having completed a site visit. The goals for FY07 include continuing to develop a mentoring program comprised of certified courses helping to both increase course participatory levels and aid in member courses becoming certified, and also to enlist the aid of watershed groups to promote the advantages of membership to courses within their region. Also, an alternative products database will be maintained in order to track alternative product usage and performance. The Green Industry Guide will continue to provide a wide variety of information on environmentally-preferred products such as re-refined oil, electric equipment, and “green” parts washers, which can be used in facilities across the state.
- The MDEQ continues to encourage **Environmentally Preferred Purchasing (EPP)** to state and local governments and to the general public through its EPP Initiative. Since inception, this initiative has worked to provide valuable resources to those interested in preferred purchasing alternatives. Given the success of an environmentally-preferred cleaning products pilot in FY06, the initiative is looking to offer an additional pilot opportunity in FY07 covering conversion from petroleum-based to bio-based vehicle/equipment fluids.
- The **State Park Stewardship Initiative** is a partnership between the MDEQ and the Michigan Department of Natural Resources to strengthen environmental stewardship at state parks. The initiative’s focus is to educate park officials and provide guidance materials on the environmental benefits of instituting best management practices, provide park visitors with information they can use at home and within their community to facilitate environmental stewardship, and provide the opportunity for technology transfer with regional and county parks. This initiative has been successful in the implementation of preferred practices and products on a park-by-park basis and will continue to seek opportunities to institutionalize these preferred practices statewide where applicable.
- The **RETAP Student Internship** continues to provide small- and medium-size companies engineering students to work on projects that integrate P2 practices and technologies into existing manufacturing and agricultural operations. Assistance is provided through a partnership between the MDEQ, Michigan’s engineering colleges, the RETAP, and businesses.

Michigan's RCRA Work Plan for Fiscal Year 2007  
Scheduled Activities  
3.6 Waste Minimization

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During FY07 the primary tool for measuring program success will be a new spreadsheet that will be used for collecting information concerning waste reduction, material reclamation, and efficient use of energy resources as a result of the implemented P2 activities. Baseline information will be collected by the intern prior to implementing the proposed P2 activity to contrast. Companies have agreed to continue the collection of data and to forward the information at 6- and 12-month intervals to the MDEQ for measuring the long-term impact of the P2 activity.

Future plans for the internship program will be to continue the use of the spreadsheet for data collection for program success, to increase the number of university partners, and to expand the base of our business partners to explore P2 at different types of facilities. The program will also explore partnerships with institutions that have two-year engineering technology programs (i.e., community colleges).

- The **Green Suppliers Network** (GSN) is an industry-government collaboration working with all levels of the manufacturing supply chain to achieve environmental and economic benefits. In FY07 the MDEQ will continue to partner with the U.S. EPA to promote the GSN Program. The Michigan GSN Initiative is working closely with The Right Place, Inc., Michigan Manufacturing & Technology Center–West, in Grand Rapids to improve performance and minimize waste along the supply chain of major office furniture manufacturers in the area. To date, participating suppliers have realized over \$150,000 of cost savings in the areas of water and energy conservation, as well as inventory reduction and improved efficiency. Through the use of state P2 technical assistance resources and programs such as the RETAP internships, suppliers have been able to actually implement waste reduction and learn recommendations at little or no cost to their organizations.

The FY07 goals of the Michigan GSN Initiative will include:

- Working with new industry sectors and their suppliers in the West Michigan Region.
- Creating a place-based eco-industrial park using the GSN model to optimize waste reduction and energy efficient activity within a given geographic area.
- Implementing chemical reduction, management, and inventory along the supply chain.
- Promoting sustainable business practices that support economic growth, social responsibility, and environmental protection.

The MDEQ will continue to support implementation of the Michigan DEQ Pollution Prevention (P2) Strategy, February 1998.

Michigan's RCRA Work Plan for Fiscal Year 2007  
Scheduled Activities  
3.7 Management and Reporting

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### **3.7 MANAGEMENT AND REPORTING**

#### Objective

Manage the program to meet its overall purposes efficiently and effectively in light of resources and constraints.

#### Considerations

- 1) Accuracy and adequacy of the MDEQ program description contained in the Work Plan.
- 2) Timeliness and accuracy of reports and other information submitted to the U.S. EPA.
- 3) Effect of internal procedures to identify, track, and complete tasks necessary to fulfill the Work Plan.
- 4) Effect of the MDEQ administrative records to support compliance and enforcement monitoring, permitting and closure, corrective action activities, and state authorization.
- 5) Effectiveness of communications with the U.S. EPA relating to management and reporting issues.
- 6) Quality of the staff training program.
- 7) Quality of laboratory support.
- 8) Quality of the MDEQ's responses to requests for information by the public.

#### Scheduled Activities

In keeping with the RCRA State Oversight Quality Assessment Team Recommendations Report (QAT Report), September 1994, the MDEQ will follow the baseline oversight reporting requirements, as specified in Attachment 1 of the QAT Report and summarized in the following table:

# Michigan's RCRA Work Plan for Fiscal Year 2007

## Scheduled Activities

### 3.7 Management and Reporting

#### Baseline Oversight Reporting

<u>Reports/Reporting</u>	<u>Frequency</u>
WDS/RCRAInfo (CME, CA)	Monthly
Financial Reporting	Annually at end of year
Equipment Inventory	Annually at end of year
Report of Staff Vacancies	Annually at end of year
Initiatives Report	Semiannually
RASPR	Semiannually
Import	Semiannually
Training	Annually
Expanded Public Participation	Optional
Waste Minimization	Semiannually
Hard Copy	
Inspections of elements	
State does not enforce	Per occurrence
Commercial (off-site)	24-hour report; inspection report to follow
Draft and final licenses	As issued, in accordance with Memorandum of Understanding
Joint Inspections	Up to ten per year
Conference Calls	
Enforcement	Quarterly or as negotiated
Permits and Closure	Bimonthly or as negotiated
Corrective Action	Bimonthly or as negotiated
WDS	Quarterly or as negotiated
File Audits	
Inspections and Enforcement	Annually at mid-year
Permits and Closures	Annually at mid-year
Corrective Action	Annually at mid-year
On-site Meetings	Annually at midyear; end-of-year; conference call before report issuance
Written Evaluation Reports	Mid-year, end-of-year
Capability Assessment	Informal, in conjunction with authorization packages
Picture Reports	Based on WDS data, can be pulled anytime

Michigan's RCRA Work Plan for Fiscal Year 2007  
Scheduled Activities  
3.7 Management and Reporting

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Laboratory Support

Estimates for laboratory support needs for FY07 are based on data generated by the MDEQ Environmental Laboratory for past analytical services and work that will result from the MDEQ's authorization of corrective action as of April 1996. Costs are divided into two categories to differentiate between samples collected during: (1) RCRA groundwater inspections (i.e., CMEs, O&Ms, and groundwater assessments) and (2) samples resulting from RCRA compliance and/or corrective action investigations. Although projected laboratory costs are chiefly for mandatory RCRA inspections, allowance has been included for additional sampling visits in support of RCRA closures, waste classification audits, and RCRA facility assessments. Estimates for laboratory support needs also include the time involved for special support of laboratory expertise regarding specific laboratory technology, methodology, and review of specified portions of Quality Assurance Project Plans (QAPPs).

All samples collected during sampling and compliance inspections will be analyzed in the MDEQ Environmental Laboratory, unless specialized analytical capability not available through the MDEQ Environmental Laboratory is required, i.e., high resolution mass spectrometry. All analyses conducted by the MDEQ will be performed in accordance with standard procedures contained in the 2006 (Revision 3) quality assurance manual entitled Waste and Hazardous Materials Division Quality Assurance Quality Control Manual for the Sampling and Analysis of Environmental Media or subsequently approved revision. A copy of this manual was originally provided to the U.S. EPA following its completion (with the assistance of the U.S. EPA contractor) in February 1998; and it was officially approved by the U.S. EPA, Region 5, on December 16, 1998. Major updating was completed during FY01, and Revision 2 was submitted to the U.S. EPA, Region 5, in February 2001. A second major update was completed in FY06, and Revision 3 was submitted to the U.S. EPA, Region 5, in May 2006. Since this manual is lengthy and the procedures contained within do not frequently change, the MDEQ will review this document on a semiannual basis and perform minor revisions, as needed. The MDEQ will submit a fully updated copy of the manual to the U.S. EPA every five years (from the date of official U.S. EPA approval) unless substantial changes necessitate a release sooner. In addition to this MDEQ reference manual, the U.S. EPA SW-846 Third Edition, with revisions, will be used.

Safety Training

The WHMD has developed a Health and Safety Program to ensure that staff, who perform duties at facilities where they may be exposed to hazardous chemicals, conduct tasks in the safest manner possible. The WHMD Health and Safety Program is designed to comply with Michigan's Occupational Safety and Health Administration standards, which includes the Michigan Hazardous Waste Operations and Emergency Response (HAZWOPER) regulations, and all applicable MDEQ health and safety policies.

- 1) All new WHMD staff who conducts sampling and/or inspections at facilities where hazardous chemicals may be present must complete at least 24 hours of safety training designed to teach chemical awareness and toxicology and to familiarize

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them with personal protective equipment that may be required to perform tasks. Employees in the HWS who may be involved in remedial site activities may need to complete a more intensive 40-hour safety training course instead of the 24 hours of training. All staff who has taken either the 24-hour or the 40-hour safety training course is required to complete an additional 8 hours of safety training annually to update their safety skills. Staff whose work duties require them to wear a respirator must complete an annual 4-hour respiratory protection refresher class, that includes a fit test, and they must be able to demonstrate that they understand and can apply the information learned during the session. All WHMD staff is encouraged to take Cardiopulmonary Resuscitation (CPR), First Aid, and Automated External Defibrillator (AED) training and to maintain their certifications.

- 2) The following training needs and costs are projected for FY07 based on current staffing levels and expected training costs:

<u>Training Needs</u>	<u>No. of Staff</u>	<u>Training Cost</u>
Initial 40-hour Safety Training	2 staff*	\$495/person
Initial 24-hour Safety Training	2-5 staff*	\$395/person
8-hour Annual Safety Training		
MDEQ Classes	52 staff	\$85/person
HazMat Classes	4 staff	\$95/person
Annual Respirator Training and Fit Test	31 staff	\$50/person
CPR/First Aid Refresher/AED Training	65 staff	<u>\$50/person</u>
Total FY07 Safety Training Cost		\$12,565

\*Initial staff training may be required is new/current employees need it and/or more intensive HAZWOPER training to satisfy MIOSHA safety requirements.

#### Financial Capability Program

The MDEQ will continue to use the state's TSD database to verify whether facilities are maintaining financial mechanisms as required by the rules. The MDEQ will send letters to owners/operators reminding them to update cost estimates, make payments into trust funds, and/or renew/replace mechanisms prior to their anniversary date. Deadlines will be tracked, and responses will be logged into the database. Owner/operators will be contacted again if no response is received or if the response is inadequate.

This verification and notification process is possible because all TSDs and financial mechanisms are listed in the TSD database. The financial mechanisms are reviewed when received and rejected if inadequate. If a mechanism is listed in the database, it has the proper wording. The major concern is that the mechanism provides sufficient coverage and that it is updated and renewed/replaced on schedule. The database can be used to determine what types of coverage are required, to determine what the owner/operator has submitted to meet those requirements, and to identify the submittal deadlines.

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The MDEQ has found this process is more effective than conducting facility-specific financial record reviews at only a limited number of facilities each year. This process highlights the inadequate financial demonstrations before they occur, putting the MDEQ in a proactive mode.

Data will be entered into WDS to demonstrate that a financial review has been completed. Because of this proactive approach, essentially all Michigan TSDs are in compliance with the financial capability requirements at any given time. To reflect this in WDS, the MDEQ will record an "in-compliance" financial record review (except when it does not apply) for the active TSDs in the Compliance and Enforcement Module in WDS. This reporting will be done periodically throughout the FY, but a financial record review will be recorded for at least one-quarter of all active TSDs by the end of the first quarter.

WDS/RCRAInfo Reporting

Michigan data for the Hazardous Waste Program is entered into WDS and translated to the U.S. EPA national hazardous waste database, RCRAInfo for Handler, Permitting, Correction Action, Compliance and Enforcement, and Hazardous Waste (biennial) Reporting data. Any disruptions in translation will be communicated to Mr. Dan Bakk, U.S. EPA, Region 5.

Compliance Monitoring and Enforcement/Handler Modules

MDEQ staff will enter quality compliance and enforcement data into WDS and will continue to translate the data into the national RCRAInfo database on a monthly schedule. The WHMD and the U.S. EPA will handle data corrections for entries with dual-agency linking within RCRAInfo Permitting, Monitoring and Enforcement, Corrective Action, and Compliance Modules according to the following procedures:

- 1) The MDEQ will continue to translate the state handler, permitting, corrective action, and compliance and enforcement data into RCRAInfo on a monthly basis.
- 2) Once the translation is successful, the MDEQ will run a query to determine which data reside in RCRAInfo, but do not reside in WDS. This could involve new data (possibly corrected) or updated data in WDS that require change in RCRAInfo.
- 3) If the necessary changes in RCRAInfo reside within a record where the U.S. EPA is the implementer of record (IOR), MDEQ staff cannot make the changes. Therefore, the MDEQ will e-mail on a monthly basis the Region 5 database contact, Mr. Bakk, a list of any permitting, corrective action, or compliance and enforcement data changes that Region 5 will need to make.
- 4) Within three weeks from the date of the e-mail, Region 5 will send the MDEQ a return e-mail iterating how changes were made in RCRAInfo, or what changes have not been made and why. This will give MDEQ staff one week to make any changes required in RCRAInfo to completely synchronize the data with WDS and retain accuracy prior to the next translation.



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- 5) If Region 5 staff does not agree to a proposed change, they will discuss it with MDEQ staff.

#### Handler Module and Biennial Reporting

The U.S. EPA identification numbers will continue to be issued through the state database, and the identification numbers will conform to the required check-digit algorithm. The MDEQ will continue processing and submitting data for the 2005 biennial reporting cycle.

#### Permit Module

The MDEQ commits to maintaining WDS to reflect current permitting, closure, and postclosure activities in Michigan, including facilities listed by the U.S. EPA, Region 5, as high priority under the federal GPRA. This data will continue to be translated into RCRAInfo on a monthly schedule.

#### Corrective Action Module

The MDEQ commits to maintaining WDS data to reflect current corrective action activities for high priority GPRA facilities where the MDEQ has the lead. The MDEQ data for RCRAInfo will be entered in WDS and continued to be translated to the U.S. EPA RCRAInfo database.

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### **3.8 SPECIAL INITIATIVES**

#### Objective

Voluntarily participate with the U.S. EPA on activities of special regulatory concern.

#### Considerations

- 1) Status of such activities as described in the Work Plan.
- 2) Effectiveness of communications with the U.S. EPA on special initiatives.

#### Scheduled Activities

The MDEQ's Special Initiatives are:

- 1) Great Lakes Initiative (GLI) Grant.
- 2) Combustion Initiative (CI) Grant.

#### GLI Grant FY07 Projects

The GLI projects are grouped as shown in the following FY07 GLI Project Summary Table, which is divided into two groups:

- 1) Projects to begin in FY07 with funds originating in FY07.
- 2) Projects to continue in FY07 with funds originating in FY06.

The summary table also shows the Total Project Cost, Federal Share, State Share, and those projects funded from the U.S. EPA contractor services accounts.

A GLI Grant Project Descriptions: New FY07 Projects table follows.

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GLI Grant Project Descriptions: New FY07 Projects

<b>Project</b>	<b>Federal Grant</b>	<b>State Match</b>	<b>Project Totals</b>
<u>Senior Environmental Employee Program (SEEP) Employees:</u> The MDEQ proposes to provide funds for ten SEEP positions. The employees will continue to work in the following areas: (1) RCRAInfo System; (2) manifest and transporter licensing; (3) STORET/groundwater data entry; and (4) district inspections and assistance with computer programs and biennial report program. One SEEP employee will continue to be used by the districts to conduct certain inspections.	\$ 270,000	\$ 0	<b>\$270,000</b>
<u>Hazardous Waste Database Integration Project:</u> The MDEQ proposes to request funds to maintain functionality in the WDS database, as well as to finance additional projects that will facilitate data translation to the U.S. EPA and increase data entry efficiency. These activities will be accomplished via a contract.	\$ 80,438	\$ 26,812	<b>\$107,250</b>
<u>Computer Upgrades:</u> The proposal includes additional upgrades of the WHMD computers to meet the MDEQ standards and to purchase printers, updated software, and other equipment to meet operational needs.	\$ 22,500	\$ 7,500	<b>\$ 30,000</b>
<u>Geographic Information System (GIS) Student Intern:</u> The MDEQ proposes to provide funding to continue the GIS student intern position for entering and maintaining data in the GIS. This position is responsible for entering regulated site locations on maps, maintaining the inventory of sites, and determining the location of historic landfills (i.e., file reviews at various state offices and local health departments, contacting state and local employees, review of soils maps, etc.). Other activities include producing computerized maps for special projects and site-specific maps and updating existing maps for the regulated facilities, which can include hazardous waste, solid waste, and groundwater discharges. Work is also needed			

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<b>Project</b>	<b>Federal Grant</b>	<b>State Match</b>	<b>Project Totals</b>
to plot the legal boundaries for landfills, institutional controls, deed restrictions, and deed notices in support of efforts to track the adequacy of long-term controls and the monitoring thereof.	\$ 6,000	\$ 2,000	<b>\$ 8,000</b>
<u>Toxicologist</u> : This proposal is for continued funding for a toxicologist hired in May 2000 to support the WHMD, Part 111 CA Program. The toxicologist would develop data quality objectives for QAPPs and cleanup criteria for RCRA/Part 111 CA, evaluate site-specific risk assessments for CA and closures, and perform other toxicology-related duties. The GPRA states that by FY08, 95 percent of high priority facilities will have human exposures controlled and 70 percent of high priority facilities will have groundwater releases controlled. All of the closures and CAs that are in the process of being performed or are in the planning stages rely on risk assessment to assure the human and ecological risks are appropriately controlled.	\$ 72,750	\$ 24,250	<b>\$ 97,000</b>
<b>GLI Grant Total</b>	<b>\$ 451,688</b>	<b>\$ 60,562</b>	<b>\$512,250</b>
<b>GLI Projects Total (Less SEEPs)</b>	<b>\$ 181,688</b>	<b>\$ 60,562</b>	<b>\$242,250</b>

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CI Grant FY07 Projects

The CI projects are grouped as shown in the following FY07 CI Project Summary Table, which summarizes the titles and costs of projects to be conducted during FY07 and funded by the CI Grant. The summary table also shows the Total Project Cost, Federal Share, State Share, and those projects funded from the U.S. EPA contractor services accounts.

CI Project FY07 Descriptions

The CI projects are grouped in the following table, which shows the Project Totals, Federal Grant, and State Match, and those projects funded from the U.S. EPA contractor services accounts.

The CI project descriptions are shown in the table below:

<b>PROJECT</b>	<b>FEDERAL GRANT</b>	<b>STATE MATCH</b>	<b>PROJECT TOTALS</b>
Dioxin Sampling Contract	\$56,250	\$18,750	<b>\$ 75,000</b>
Investigation of Tittabawassee River, Midland, Saginaw River, Saginaw Bay, and MDEQ/Dow-Tri Cities Community Involvement	\$26,250	\$ 8,750	<b>\$ 35,000</b>
<b>CI Grant TOTAL</b>	<b>\$82,500</b>	<b>\$27,500</b>	<b>\$110,000</b>

## **Hazardous Waste Section – Revised 2007 CME/O&M and PC Cap Inspection Quarterly Schedule**

### **First Quarter**

Facility Name	EPA ID Number	Scheduled Commitments	Commitment Due Date
Dow Chemical Main Plant & Incinerator	MID 000 724 724	PC Cap Inspection (NW Plant)	First Quarter
Former Wyckoff Steel Inc.	MID 004 508 628	Groundwater O&M Inspection	First Quarter
Grand Blanc Landfill	MID 980 506 265	Post Closure Cap Inspection	First Quarter

### **Second Quarter**

Facility Name	EPA ID Number	Scheduled Commitments	Commitment Due Date
Alma Facility (TPI) (Former Ponds)	MID 005 358 130	Groundwater O&M Inspection	Second Quarter
Grand Blanc Landfill	MID 980 506 265	Groundwater O&M Inspection	Second Quarter
The Dow Chemical Company – Salzberg	MID 980 617 435	Post Closure Cap Inspection	Second Quarter
Woodland Meadows LF North	MID 000 810 408	Groundwater O&M Inspection	Second Quarter

### **Third Quarter**

Facility Name	EPA ID Number	Scheduled Commitments	Commitment Due Date
Alma Facility (TPI) (Former Ponds)	MID 005 358 130	Post Closure Cap Inspection	Third Quarter
Automotive Components Holdings	MID 005 057 005	Groundwater O&M Inspection	Third Quarter
Woodland Meadows LF North	MID 000 810 408	Post Closure Cap Inspection	Third Quarter

### **Fourth Quarter**

Facility Name	EPA ID Number	Scheduled Commitments	Commitment Due Date
Dow Chemical Main Plant & Incinerator	MID 000 724 724	PC Cap Inspection (SE Plant)	Fourth Quarter
Lacks Industries Inc.	MID 006 014 666	Groundwater O&M Inspection	Fourth Quarter
MDEQ Storage Facility	MID 980 825 632	Groundwater O&M Inspection	Fourth Quarter
Occidental Chemical Corp.	MID 006 014 906	Post Closure Cap Inspection	Fourth Quarter
Wayne Disposal Inc.	MID 048 090 633	Groundwater O&M Inspection	Fourth Quarter
Dow Chemical Main Plant & Incinerator	MID 000 724 724	PC Cap Inspection (NW Plant)	First Quarter to Fourth
The Dow Chemical Company – Salzburg	MID 980 617 435	Post Closure Cap Inspection	Second Quarter to Fourth